

July 1, 2021

PUBLIC DOCUMENT

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St. Paul, MN 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce**
Docket No. P421/C-20-432

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in response to the Minnesota Public Utilities Commission's (Commission's) December 1, 2020 Notice for Comment in the following matter: In the Matter of the Formal Complaint Regarding the Services Provided by the Qwest Corporation d/b/a CenturyLink in Minnesota, on behalf of the Communication Workers of America (CWA).

Sincerely,

/s/ LISA GONZALEZ
Rate Analyst

/s/ JOY GULLIKSON
Rate Analyst

LG/JG/ar
Attachment



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Provided by the Qwest Corporation d/b/a CenturyLink in
Minnesota, on behalf of the Communication Workers of America
(CWA).**

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Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. P421/C-20-432

I. INTRODUCTION

The Department of Commerce (Department) respectfully submits the following Comments in response to the Minnesota Public Utilities Commission (Commission) Notice of Comment Period issued on December 1, 2020. The Commission seeks comments related to the following topics:

- Provide evidence that demonstrates whether CenturyLink is in compliance with Minnesota statutes, rules, or Commission orders, including, but not limited to:
 - Delaying or missing repair dates
 - Not maintaining CenturyLink's phone network
 - Tracking customer complaints
 - Any other service quality issues or concerns
- Has CenturyLink made recent network investments or staffing changes that are relevant to this docket?
- Are there other issues or concerns related to this matter?¹

The Department's investigation reveals issues in two distinct areas of concern: customer service and network maintenance. The Department's investigation yielded information that shows or strongly suggests that CenturyLink is not meeting the requirements of Minnesota Rules 7810.1100, 7810.1200, 7810.3300, 7810.4900, 7810.5000, 7810.5200, 7810.5800, and 7810.6000. CenturyLink is neither maintaining its network nor is it serving its customers in the manner prescribed by Minnesota's rules and statutes.

These comments are laid out in the following manner:

- Tracking customer complaints
- Delaying or missing repair dates
- Not maintaining CenturyLink's phone network
- Network investments and staffing changes
- Other service quality issues

¹ Commission Notice Docket P421/C-20-432, December 1, 2020.

II. COMPLAINT BACKGROUND

Original filing. On April 23, 2020, the CWA filed what it termed “a formal complaint.”² In its letter, the CWA alleged that Qwest Corporation, d/b/a CenturyLink in Minnesota was not meeting the requirements of the following Minnesota Rules:

- 7810.2800. Delay in Initial Service
- 7810.3300 Maintenance of Plant and Equipment
- 7810.5500 Transmission Requirements
- 7810.5800 Interruptions of Service
- 7810.5900 Customer Trouble Reports
- 7810.6000 Protective Measures

As part of its complaint, the CWA provided pictures of outside plant in various states of disrepair. The CWA stated that CenturyLink’s proposed layoff of outside technicians would exacerbate CenturyLink’s failure to comply with the Commission’s quality of service requirements.

Withdrawal. The CWA and CenturyLink entered negotiations soon after the CWA’s original filing, and as a result, the CWA chose to withdraw its complaint.³ The Commission accepted the withdrawal of the complaint, but requested that the CWA and CenturyLink provide the Commission “with information documenting the service issues which compelled the CWA to make its original complaint filing, and how those service issues have been resolved in order for the complaint to be withdrawn.”⁴ Both CenturyLink and the CWA responded to the Commission’s request for additional information, but not with any detail to facilitate the Commission’s understanding of either the service issues which compelled the complaint or how the issues were resolved.

CWA Request for Investigation. Following an apparent breakdown in talks, on August 18, 2020, the CWA filed another letter, requesting “ that the PUC commence a full and complete investigation of CenturyLink and its failures to meet its obligations immediately.”⁵ The CWA further requested that the Commission expedite the investigation as much as possible.⁶ The CWA alleged that CenturyLink may be violating Minn. R. 7810.4900 in addition to the violations alleged in its April 23, 2020 complaint.

First Notice of Comment Period. The Commission issued a Notice of Comment Period on August 24, 2020.⁷ The Commission sought responses to questions related to the form of the CWA complaint, whether or not the Commission had jurisdiction over the matter in question, if there were reasonable grounds to investigate CWA’s allegations, and if there were other issues or concerns related to the matter.

² CWA letter to the Public Utilities Commission, dated April 23, 2020, Document No. 20204-162321-01

³ CWA withdrawal letter filed May 1, 2020, Document No. 20204-162752-01.

⁴ Commission letter to CenturyLink, May 18, 2020. Document No. 20205-163301-02.

⁵ CWA letter filed August 18, 2020, p. 3, Document No. 20208-165981-01.

⁶ Ibid.

⁷ Notice of Comment Period, Docket P421/C-20-432, Document No. 20208-166126-01, August 24, 2020.

On September 18, 2020, CenturyLink stated that the CWA's letter filed on August 18, 2020, did not meet the requirements for a formal complaint.⁸ CenturyLink stated that the required number of subscribers did not complain, rendering the CWA complaint invalid. CenturyLink went on to state that the allegations made by CWA were not supported by sufficient detail to garner violation of the Minnesota Rules. CenturyLink also stated that the network, contrary to CWA allegations, was healthy and that the company makes regular repairs when needed. The company also denied the allegation that it did not maintain customer complaint records. CenturyLink went on to state that, while the PUC has jurisdiction over quality of service matters as they relate to telephone service, it does not have jurisdiction over labor relations matters.

On October 21, 2020, the Department of Commerce filed comments stating that numerous complaints from CenturyLink customers had led to a concern about the quality of service.⁹ Taken in conjunction with the CWA complaint, the Department stated that CWA technicians, with their unique knowledge of the field, could help identify areas of concern. The Department also stated that the Commission has jurisdiction to investigate CenturyLink's operations, as an incumbent telephone company, for potential violations. Lastly, the Department noted that anecdotal evidence, photos of broken plant, customer complaints, and a reduction in operating force to care for the network, are sufficient factors to warrant an investigation.

On October 23, 2020, the Office of the Attorney General (OAG) filed comments, which recommended that the Commission find that it has jurisdiction over the CWA complaint.¹⁰ The OAG stated that the Commission is responsible for ensuring that the company remains in compliance with established standards to guarantee acceptable service quality for voice services and noted that CenturyLink conceded in its comments that the Commission has jurisdiction over this matter. The OAG also recommended the Commission find that the CWA complaint complied with the Commission's procedural rules governing complaints because it named the statute and rule to have been violated, described the facts supporting the alleged violation, and stated the relief the CWA was seeking. Additionally, the OAG recommended that the Commission formally investigate the allegations made by the CWA in both complaints because, based on replies to information requests from CenturyLink and from the CWA, the company does not appear to be in compliance with service quality standards. The OAG also stated that other questions beyond the CWA allegations, including customer care records and the condition of the CenturyLink infrastructure, warrant an investigation.

On November 5, 2020, CenturyLink filed a letter to update the Commission on the anticipated workforce reduction.¹¹ The letter stated that, after reviewing the technician needs in Minnesota, CenturyLink had reduced the number of involuntary reductions from the original 154 to 36 and that no more reductions were planned at the time.

⁸ CenturyLink Comments, Docket No. P421/C-20-432, p. 3. Document No. 20209-166678-01, September 18, 2020.

⁹ Department Comments filed October 21, 2020, p.5, Document No. 202010-167574-01.

¹⁰ OAG Comments filed October 23, 2020, pp. 4, 13, Document No. 202010-167605-02 -03 (trade secret) and 202010-167605-02 -02 (public).

¹¹ CenturyLink Letter filed November 5, 2020, Document No. 202011-168068-01.

On December 1, 2020, the Commission issued a Notice of Comment Period, which established the initial comment period closing date as March 1, 2021, and the reply comment closing date as April 1, 2021.¹²

On February 19, 2021, the Commission issued a Notice of Extended Comment Period at the Request of the Minnesota Department of Commerce, which extended the Initial comment period to March 31, 2021, and the Reply comment closing date to April 30, 2021.¹³

The Commission granted a further extension to July 1, 2021.

A. APPLICABLE LAWS AND RULES AND COMMISSION JURISDICTION

CWA alleged possible violations of the following Minnesota Rules.

7810.2800 Delay in Initial Service
7810.3300 Maintenance of Plant and Equipment
7810.5500 Transmission Requirements
7810.5800 Interruptions of Service
7810.5900 Customer Trouble Reports
7810.6000 Protective Measures

In addition to the above, Department staff reviewed possible noncompliance with the following Rules:

7810.1100 Complaint Procedures.
7810.1200 Record of Complaint.
7810.4900 Adequacy of Service.
7810.5000 Utility Obligations.
7810.5200 Answering Time.

III. DEPARTMENT ANALYSIS

The Department's investigation consisted of reviewing complaints filed with the Commission's Consumer Affairs Office (CAO) and reviewing responses to information requests sent to CenturyLink and to the Communications Workers of America (CWA) by the Department and by the Office of Attorney General. In addition, the Department directly obtain, via a survey, customer experiences with telephone services offered by CenturyLink. The questions are included in Attachment 1. References to the survey responses the Department received between June 1 and 10, 2021, as well as other customer contacts, are incorporated into these comments.

¹² Notice of Comment Period issued December 1, 2020, Document No. 202012-168666-01.

¹³ Notice of Extended Comment Period issued February 19, 2021, Document No. 20212-171141-01.

B. TRACKING CUSTOMER COMPLAINTS.

In its notice, the Commission asked whether CenturyLink complies with the Minnesota Rules that describe the way a telephone utility must track customer complaints. In its review, the Department concluded that CenturyLink is violating several rules applicable to customer complaints: Minn. R. 7810.1100 (Complaint Procedures), Minn. R. 7810.1200 (Record of Complaint), and Minn. R. 7810.5200 (Answering Time). Customer complainants frequently express frustration with CenturyLink's call answering system that makes it difficult to speak with a customer service representative. Because many customers report they are unable to reach a person to address their issues in a reasonable time period, all metrics that rely in whole or in part on customer contacts, such as trouble reports and out of service reports, may be inaccurate. Another factor preventing CenturyLink from achieving compliance is its definition of "complaint" that results in an undercount of complaints.

1. CenturyLink uses an unreasonable "complaint" definition that understates its actual complaint volume

According to Minn. R. 7810.1100, subp. 2, CenturyLink must contact a customer within five days when his or her complaint cannot be promptly resolved. CenturyLink must update the customer every two weeks thereafter. In addition, when the Commission refers a complaint to CenturyLink, it must notify the Commission about how the complaint was resolved. Minn. R. 7810.1100, subp. 2–3. Importantly, whether a statement constitutes a complaint should not depend on the recipient's actions or response. It also should not depend on the mode of communication. Yet, CenturyLink only defines complaints as:

Any customer issue or concern that cannot be (or is not) addressed or resolved through normal business practices and channels. Issues that require escalation to or intervention by CenturyLink executives, outside agencies such as regulatory bodies, elected officials, the Better Business Bureau or the media are considered complaints and handled accordingly.¹⁴

By adopting this textually unmoored definition, CenturyLink treats customer expressions of dissatisfaction or frustration as "interactions" unless they are referred by a third-party or require internal escalation. In response to an information request, CenturyLink further admitted that direct calls from customers seeking help with a problem were not considered "complaints" for purposes of Minn. R. 7810.1100.¹⁵

CenturyLink's approach is inconsistent with Minn. R. 7810.1100. First, nothing in the rule limits complaints to those referred by third-parties or that require escalation. In fact, the rule requires that qualified personnel be available to resolve "customer inquiries, requests, and complaints" Minn. R. 7810.1100, subp. 1. The rule clearly anticipates that complaints may come directly from customers. The rule also clearly indicates that even if a complaint can be resolved or addressed, it is still a

¹⁴ As part of DOC IR #19, the Department asked CenturyLink to provide its definition of "complaint" for purposes of the rule. Rather than offer a definition, the company referred to its comments in *In re Comm'n Inquiry into CenturyLink's Compliance with TAP Statutes & Rules*, Docket No. P421/CI-17-796, Reply Comments at 7 (Mar. 29, 2018). See Attachment 2 (CenturyLink Response to IR #19, Question 1).

¹⁵ *Ibid.*

complaint since the customer contacted CenturyLink with a problem. By failing to recognize problems brought directly to CenturyLink's attention by customers as complaints and failing to recognize as complaints those customer calls where CenturyLink addresses or resolves the problem, CenturyLink is understating its true complaint volumes.

The Department agrees that companies need flexibility when addressing complaints from customers. Not every complaint is simple to resolve and some are not legitimate. Flexibility comes into play, however, in determining how best to resolve customer complaints, whether they are legitimate, and how to use the complaints to "analyze its procedures and actions." CenturyLink's extremely narrow definition of complaint excludes potentially thousands of complaints and creates an inaccurate portrayal of the company's complaint response rate.

In response to an information request, CenturyLink described how the company handles various types of customer complaints. Without acknowledging that customers who call CenturyLink to express dissatisfaction are "complaints," CenturyLink employs Repair Agents, who are "skilled in technical troubleshooting", and Customer Care Agents, who are "focused on billing, payments, and upgrades."¹⁶

The company website provides separate telephone numbers for customers to call, based on the reason for placing the call.¹⁷ While the separate numbers may be intended to allow a trained representative to be connected with a customer in an expeditious manner, customers still complain, often vociferously, about the number of times they are transferred, and the length of time it takes to reach a qualified person to help (see discussion about Minn. Rule 7810.5200 below). The company attributes extended hold times in the past year to employee constraints caused by the Covid-19 pandemic, resulting in an increase in the volume of calls.

CONCLUSION:

CenturyLink uses a "complaint" definition that is disconnected from the term's plain language meaning. Instead of focusing on whether the customer is dissatisfied, CenturyLink classifies "complaints" as "inquiries" based on its response and how it received the "inquiry." This is unreasonable. It also is self-serving because it understates the true volume of complaints. CenturyLink's unreasonable interpretation of "complaint" masks the real level of performance that customers are experiencing and is not aligned with the language of Minn. R. 7810.1100.

RECOMMENDATION:

The Commission should clarify for CenturyLink that a complaint should be defined as any customer communication that expresses dissatisfaction with CenturyLink service, whether received directly from a customer or from a third party, placing focus on the substance of the customer communication. The company's response to the customer complaint, and whether or not CenturyLink resolves the complaint, are irrelevant to the definition of "complaint."

¹⁶ CenturyLink Response to DOC IR #8, Attachment 3.

¹⁷ See <https://www.centurylink.com/home/help/contact.html>. For example: "Order New Services: 866-963-6665" and "Account Tech and Support: 800-244-1111".

2. *CenturyLink is not consistently updating customers when a complaint cannot be promptly resolved and lacks qualified personnel to resolve customer inquiries in violation of Minn. R. 7810.1100*

Minn. R. 7810.1100, subp. 1, requires CenturyLink to establish procedures that make qualified personnel available to “resolve all customer inquiries, requests, and complaints.” Minn. R. 7810.1100, subp. 2, in turn, requires CenturyLink to contact the customer within five days when his or her complaint cannot be promptly resolved, and provide an update every two weeks thereafter. Based on its review of customer complaints and survey responses, the Department believes that CenturyLink is violating both rule requirements.

The Department’s review of customer complaints revealed instances in which CenturyLink has been unresponsive.¹⁸ One customer, for example, contacted CAO to report an outage which had not been repaired and in which there had been no follow-up from CenturyLink.¹⁹ The customer had called CenturyLink three days after the initial repair call and experienced a long wait time before reporting the outage, for the second time. After this second call did not prompt the company to repair the outage, the customer sought CAO’s help, which contacted CenturyLink on behalf of the customer. When the Department learned of the complaint, the outage had been repaired, but CenturyLink had not yet responded to a request from the CAO for credit.

In another example related to a failure to respond to a customer complaint, Ms. P called CenturyLink to cancel her landline service and retain her internet access in February 2020. After a significant wait, she was assured that her request would be completed the next day, but the company performed the opposite, leaving her without internet access, and leaving her with landline telephone service that she no longer wanted. Over the course of a year, Ms. P called CenturyLink multiple times and was told “there was nothing they could do” to correct their mistake. CenturyLink continued to bill her for the landline service that she did not want or use and, when she called to correct their error, she was transferred from agent to agent, telling her story each time, sometimes being disconnected, and other times she spent hours on the phone with no resolution.²⁰ CenturyLink did not commence an investigation into why Ms. P’s simple request had not been completed or corrected until Ms. P contacted the Department, who reached out to the company. Ms. P had the burden of repeatedly calling CenturyLink to stay informed and attempt, with no results, to correct the billing error. Ms. P, who is disabled after an auto accident, requires internet access for home security.²¹

¹⁸ The Department’s reviewed 85 CAO complaints from September - December 2020, in addition to approximately 180 survey responses. The CAO complaints represent only those issues that the company recognizes as “complaints” because they originate from the PUC, rather than their customers. Due to the company’s restrictive definition of “complaint,” and difficulty customers experience in extended answering times, it is impossible to know how many customers have problems that need addressing.

¹⁹ case #76068

²⁰ In response to DOC IR #10, CenturyLink was asked specifically about this customer’s situation. CenturyLink stated that it was still gathering information about this specific customer and would make that information available at a later date. At this writing, that information has not been forthcoming. Ms. P. has been credited for the landline service that she tried to cancel after the Department inquired as to why this situation was not resolved after a year.

²¹ See Statement of Ms. P, Attachment 4.

Of the approximate 180 respondents who took the time to reply to the Department's survey (sent via AARP-MN), 40 (22%) wrote positive comments about CenturyLink. Of those 40, 18 (10%) specifically mentioned that they had favorable interactions with CenturyLink's customer service. The Department appreciates that respondents made positive comments on their interactions with CenturyLink, but the number of negative experiences is concerning. The following are some of the survey respondents' negative experiences:

I have had very negative billing experiences that took 1 1/2 years to resolve. I was on the phone for hours either on hold or getting transferred from one person to the next and then I would be disconnected and have to start the process over. . . . Another time when I started to tell the customer service agent my problem and they pulled up my account and saw all of the notes regarding my previous calls they hung up on me. . . . Supervisors never called me back when the agent said the supervisor would have to deal with it and they weren't available.²²

I connected to a person right away. She could find NO documentation on my account from my call a week ago!²³

On multiple occasions, I have spent hours on the phone trying to get Century Link to bury the cable. During these contacts, Century Link representatives have assured me that the cable would be buried within a month or so. After nearly 4 years the cable still lays unburied on the ground on my property! I don't seem to have any recourse in getting CenturyLink to complete the repair process.²⁴

These examples suggest that complaints—that linger for years—are not being received or resolved by CenturyLink. To the extent that these failures arise from a lack of qualified personnel, CenturyLink is in violation of Minn. R. 7810.1000, subp. 1. To the extent that CenturyLink is not pursuing these customer concerns because they are not viewed as “complaints,” the company also may be violating its obligation to follow-up with customers under subpart 2.

CONCLUSION:

CenturyLink is not consistently updating customers when a complaint cannot be promptly resolved in violation of Minn. R. 7810.1100. It also appears to lack qualified personnel to handle seemingly routine issues related to billing and services outages. This problem is underscored by long hold times and excessive transfers that suggest CenturyLink's “qualified personnel” problem relates to staffing levels in addition to staff training or procedures.

²² Attachment 5, Customer Number 0112. Note: Attachment 5 contains a sample of responses to the email survey sent out by LMC and AARP, as discussed on page 4 of these comments. Customers are identified by number only.

²³ Attachment 5, Customer Number 0135

²⁴ Attachment 5, Customer Number 0099

RECOMMENDATION:

If the Commission finds that CenturyLink has violated the rule, the Commission should establish a proceeding to determine the number of violations and the number of days of violations, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.²⁵ If the Commission determines that significant factual issues remain, the Commission may refer the matter to the Office of Administrative Hearings (OAH) to create a record upon which the Commission may make its determination.

To address the ongoing concern, the Department recommends that the Commission order CenturyLink to file a plan to improve its complaint procedure within 45 days of the Commission's Order in this matter. The new procedure should take into account a process for categorizing customer interactions as: 1. Inquiries; 2. Requests; or 3. Complaints. The complaint procedure improvement plan should detail how CenturyLink personnel will be trained to use the new procedures. The complaint procedure improvement plan should be submitted for Commission approval and include a comment period to give interested parties the opportunity to support or recommend changes to the plan.

After Commission approval of the complaint procedure improvement plan, CenturyLink should be required to implement the plan within 60 days, unless CenturyLink asks for, and receives Commission approval of, a different implementation schedule.

On a monthly basis after the complaint procedure improvement plan is implemented, CenturyLink should be required to file a report on its customer interactions that are inquiries, requests, and complaints. The reports should include the name and address for the customer, the complaint codes and other specifics for the type of complaint when a complaint is submitted, the date the complaint was filed, the date the complaint was resolved or addressed, and whether the customer has expressed that they are satisfied with the outcome. Such reporting should continue until the Commission finds that CenturyLink is satisfactorily complying with its performance obligations on customer complaints.

3. CenturyLink is not adequately maintaining customer complaint records as required by Minn. R. 7810.1200

Minn. R. 7810.1200 requires CenturyLink to maintain "a record of all complaints received by it from its customers" and do so "in such a manner as will enable it to review and analyze its procedures and actions." CenturyLink states that 100% of Customer Care calls are audio recorded. Agents answering Repair Calls generate reports for supervisors to monitor workflow.²⁶ However, a Department inquiry relating to a customer complaint, revealed that "calls between [Consumer Affairs Group] representatives and customers are not normally recorded."²⁷ This systematic practice suggests that the company is not fully maintaining records of customer complaints. Partial records interfere with CenturyLink's ability "to review and analyze its procedures and actions," as required by the rule.

²⁵ Minn. Stat. § 237.461.

²⁶ See Response to DOC IR #8, Attachment 3.

²⁷ See Letter from CenturyLink dated May 18, 2021, Attachment 6. (the letter has been amended to remove the name of the subscriber).

CONCLUSION:

CenturyLink's apparent practice of maintaining partial records violates Minn. R. 7810.1200. Without access to all complaint records, CenturyLink supervisory personnel cannot adequately "review and analyze its procedures and actions." It also hampers the ability of regulatory agencies to provide adequate oversight.

RECOMMENDATION:

If the Commission finds that CenturyLink has violated the rule, the Commission may establish a proceeding to determine the number of violations and the number of days of violations, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.²⁸ If the Commission determines that significant factual issues remain, the Commission may refer the matter to OAH to create a record upon which the Commission may make its determination.

The recommended process outlined above, establishing a complaint procedure, addresses the requirement for CenturyLink to maintain records of all customer complaint calls to meet its Minn. R. 7810.1200 obligations.

4. CenturyLink is not answering 90% of calls within 20 seconds as required by Minn. R. 7810.5200

Minn. R. 7810.5200 requires that CenturyLink answer 90% of repair calls and other calls within 20 seconds. The rule further defines "answer" as "the operator or representative is ready to render assistance and/or ready to accept information necessary to process the call." CenturyLink's performance metrics, however, demonstrate the company struggled to comply with the standard particularly for calls placed to the business office. **[TRADE SECRET DATA HAS BEEN EXCISED]**

For example, Ms. P contacted CenturyLink at least eight times (seven via phone and once through the chat feature) between February and December 2020. She documented seven phone calls, reporting that she experienced long hold times and multiple transfers every time she called. The longest hold time she experienced after being transfer was three hours:

They sent me to retention dept. After 2 hours 42 minutes on hold I hung up. Tried cust svc and asked for supervisor. They put me on hold and left me there for 33 min. I hung up. . . . Attached files are just 2 examples of proof of hold time with no answer. Calls were made to sales to talk to a human but then transferred to retention dept that won't answer.²⁹

²⁸ Minn. Stat. § 237.461 Enforcement

²⁹ In her email complaint, Ms. P included screenshots of her phone calls to CenturyLink's numbers which displayed call times of 23:53 and 2:42:22. Attachment 7.

She also reported hold times on other calls of 1 hour and 16 minutes, 28 minutes with no answer, and disconnections after multiple transfers between collections, retention, and Customer Care agents. In addition to Ms. P's experience, 40 of the approximately 180 survey respondents (22.2%) complained about long hold times when phoning CenturyLink. Of those 40 people, 11 said they had given up calling CenturyLink because it took so much time.³⁰ Other respondents explained:

If you call customer service you have to have hours to commit.³¹

When I call, I am on hold for long periods of time. I have waited on hold for 30-40 minutes repeatedly, and as long as 60 minutes before I gave up.³²

When calling it takes a very long time to get to a live agent, even when saying agent.³³

The last couple times I remember calling, I had to hang up because I was on hold too long.³⁴

CAO reports similar customer experiences including one from a customer who had called twice, but whose call was not answered. Finally, on the third attempt, they were disconnected when they reached an agent.³⁵ A different caller waited over an hour to report an outage that had persisted for two weeks³⁶ while another complained about a "lengthy wait" to report a 4-day outage.³⁷

Often customers find their extended hold time directly related to multiple transfers from one agent to another. In addition to the annoyance that comes with being on the line for a long time, callers find that they must repeat their reason for calling, heightening their frustration. A few of the survey respondents described how they were transferred from Agent to Agent:

On several occasions the wait time exceeded 30 minutes. My calls were transferred to multiple departments and multiple representatives. My calls were dropped or hung up on during transfers. I had to call back and have to explain again what my concern was about a billing issue or service issue.³⁸

I hate having to call them, as it's [hard] to get thru to a live person and if you do, expect to get transferred several times before getting anyone to help you. . . The last time I called was extremely frustrating. I was on hold for 56 minutes trying to reach someone.³⁹

³⁰ See Attachment 5 for more survey responses regarding hold time.

³¹ Attachment 5, Customer Number 0019

³² Attachment 5, Customer Number 0022

³³ Attachment 5, Customer Number 0066

³⁴ Attachment 5, Customer Number 0084

³⁵ CAO complaint no. 75657.

³⁶ CAO complaint no. 76078.

³⁷ CAO complaint no. 75678.

³⁸ Attachment 5, Customer Number 0145

³⁹ Attachment 5, Customer Number 0087

[TRADE SECRET DATA HAS BEEN EXCISED]**CONCLUSION:**

CenturyLink does not appear to be complying with Minn. R. 7810.5200. Neither the company's self-reported data nor experiences shared by customers suggest that CenturyLink is "answering" calls within 20 seconds; namely, by rendering assistance. Instead, customers struggle to connect with customer service representatives and then often experience lengthy delays where no assistance is rendered.

RECOMMENDATION:

Since CenturyLink's own data shows that it has violated Minn. R. 7810.5200, the Commission may establish a proceeding to determine the number of violations and the number of days of violations, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.⁴⁰ If the Commission determines that significant factual issues remain, the Commission may refer the matter to OAH to create a record upon which the Commission may make its determination.

To address the ongoing concern, CenturyLink should be required to report answering time service levels to the Commission on a monthly basis until it has reached consistently for three months a 90% answer rate within 20 seconds of the caller's last menu selection.⁴¹ CenturyLink should also be required to report to the Commission on the number of calls dropped prior to connecting with an agent per month, along with the shortest, longest, and average length of wait time before the calls were dropped. The company should begin these reporting requirements for its repair call center, and residential and commercial business offices within 60 days of the Commission's Order, unless CenturyLink requests, and the Commission agrees to, a different time frame.

C. CENTURYLINK IS NOT RESTORING 95% OF REPORTED TROUBLES WITHIN 24 HOURS IN VIOLATION OF MINN. R. 7810.5800'S MINIMUM OBJECTIVE

The Commission asked parties to address whether CenturyLink complies with Minnesota Statutes, Rules, or Commission Orders concerning delayed and missed repair dates. Considering this question, the Department concluded that CenturyLink's performance is inconsistent with Minn. R. 7810.5800. The rule sets a minimum objective of clearing "95 percent of all out-of-service troubles within 24 hours of the time such troubles are reported." It also requires CenturyLink to mitigate disruptions if line work will cause an outage. This rule has significant implications for customers that depend exclusively on their landline telephone service for their communications, including access to 911 emergency service. In particular, people living in rural areas and elderly people may rely on their landline telephone.

⁴⁰ Minn. Stat. § 237.461 Enforcement

⁴¹ The rule requires 90% of repairs service calls, calls to the business office, and other calls, to be answered within 20 seconds, however, an answer within 60 seconds would be a significant improvement from the current answer times. The Department recognizes that changing the standard would require an additional proceeding.

CenturyLink was far from meeting the 95 percent service restoration within 24 hours in 2020, with many exchanges not meeting the goal.⁴² Not only does CenturyLink not meet the goal using its own metrics, but the Department believes that troubles are underreported due to the inability of customers to reach customer service. CenturyLink's OOS Report, which provides performance statistics for each month and in each exchange, shows the percentage of customers that were out of service for greater than 24 hours by month and by exchange.⁴³ CenturyLink's data revealed that it met the required 95% OOS 24-hour restoration standard only in the months of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Department staff also reviewed CenturyLink customer complaints shared with CAO from between September and December 2020 for anecdotal evidence on CenturyLink's compliance with the OOS metric. In eleven cases, consumers contacted CAO because their telephones had been out of service from three days to several weeks. Typically, customers contacted CenturyLink more than once to report the outage, sometimes finding that CenturyLink Customer Care Agents needed to issue new trouble tickets each time. In other instances, technicians were deployed to repair the problem, however, the customer's service went out again days later.

Approximately 18% of the nearly 180 people responding to the Department's survey mentioned similar problems related to outage issues. People specifically reporting prompt restoration of outages were 5% of the survey respondents. CenturyLink customers typically mentioned that repair appointments were not available for days or sometimes weeks after their call to CenturyLink to report the outage. Occasionally, missed repair appointments would extend the outage or repair problem. A respondent in St. Paul, for example, shared their experience with an outage that began in July 2019:

On July 4 our phone was dead all day and the internet was intermittent. I scheduled an appointment for **July 10, the earliest available**. On July 5 our phone began working again and kept working, so on July 8 I cancelled the appointment, thinking it wouldn't be necessary, which turned out to be a very unfortunate idea. On July 10 our phone was dead and the internet was intermittent. I scheduled another appointment for July 16, **the first available**. The phone stayed dead until late in the evening, July 15, when it began to work intermittently. . . . Our phone is dead again today, July 31, and the internet is intermittent, and we are now **waiting for two weeks for a technician** who may or may not come and may or may not be able to diagnose the problem, based on whether the phone is working that day or not. . . . **I find it unacceptable to be made to wait a week, or worse, TWO weeks, for service.** . . . I would like a technician to come that same day I report the problem to fix it while it is happening, or at the very least, within three days.⁴⁴ [emphasis added]

⁴² Response to DOC IR #7, question 2, Attachment 9. CenturyLink has continued to rely on a methodology included in an expired AFOR plan. See OAG IR #025 Attachment 10

⁴³ Response to DOC IR #3, Att. 3. The file is too big to replicate. In Attachment 11 a partial screen shot is provided.

⁴⁴ See Attachment 5 for more samples of customer responses from the AARP survey about CenturyLink subscribers being required to schedule telephone repairs days or weeks into the future.

Beyond the obvious long wait times for service restoration, the way CenturyLink reports its data may underestimate how long customers are waiting for repairs. CenturyLink states that, "[T]he start time is the Date/Time the ticket was created when the customer called in. The stop time is the Date/Time the service was restored/ticket closed."⁴⁵ The CWA asserts, "The Company liberally defines a commitment as being 'met' if the repair happens on the day it is initially *scheduled*, notwithstanding the fact that the day the repair is scheduled is rarely within 24 hours of the customer call."⁴⁶ However, under the rule, the 24 hour period begins when the trouble is reported, not when CenturyLink schedules the appointment. If CenturyLink (not the customer) cancels or reschedules an appointment, it should not restart the 24-hour period.

CWA goes on to state, "Customers, unaware of the PUC rules and regulations, are encouraged by the Company to accept the 'earliest possible' appointment for repair at dates and times well beyond 24 hours from the call reporting the outage. The Company's records do not reflect this."⁴⁷ Complaints the Department and CAO receive during the usual course of business and the survey responses support the CWA's statement:

My mother's phone developed so much static that it totally stopped working. Placed a call to Century link on a Thursday around 6pm. Took me well over 30 minutes to follow the choices to get to talk to a real person. They had given a fix date **on the following Tuesday** and I found this unacceptable. My mother is 89 years old and depends on a Lifeline for safety., which requires a working phone line. I explained this to them, but it did no good. Fix date remained at that following Tuesday. It was fixed on that day and was bad line to her house. Incidentally, she did fall over the weekend and was on floor for 6 hours because her Life line did not work. They would never think of crediting your bill for 4 days. If there was any other option, I would not use CenturyLink.⁴⁸

An 88-year old survey respondent called to describe how she called on a Thursday to report buzzing on her line that made it unusable; **she was told no one would be available until Monday.**⁴⁹

[The] initial repair was scheduled for **5 Days (3 business Days) after the call reporting the issue . . . also Century Link did not show up the day of the appointment . . . they came one day later!** . . . My 95 Year Old Mother does not have a cell phone, does not have anyone checking on her daily, uses Life Line notification system (Emergency Button on chain around neck) for emergency situations... Important to note life line works through

⁴⁵ Response to DOC IR #12, Question a Attachment 12.

⁴⁶ CWA Response to IR OAG #003, Attachment 14.

⁴⁷ Response to IR OAG #002, Attachment 13.

⁴⁸ Attachment 5, Customer Number 0176

⁴⁹ Attachment 5, Customer Number 1003

the phone lines... So my 95 year old mother was isolated for 5 days! This concern of lack of ability to communicate in case of emergency was expressed to century link at time the phone issue was reported...response was professional, but uncaring...century link was unwilling to do anything extra to address this high customer risk situation.⁵⁰

I was told for the repair ticket **the earliest repair time** would be 12 - 14 days . . . This happened on 2 occasions. . . . Both times I was told 12- 14 days as the EARLIEST repair time and that I should have purchased a business phone line instead if I wanted faster service.⁵¹

Ms. M contacted the Department after dealing with CenturyLink on behalf of her parents living in St. Paul. When their landline went out due to a Technician's error, they had no way to call 911. Ms. M wrote:

My Mom is in hospice at home. Because they have not prioritized their repair, my Dad has no way to contact family, hospice or 911 if he needs help. My Dad had to leave my Mom alone in her hospital bed to drive to my brother's house and alert us. **I have been trying since Friday to get a technician to repair the damage they did to the line. I have been told since Friday that an emergency alert was put in the request. However, three days later, and they are now saying that they cannot have a technician do repair until Tuesday, August 25.** . . . There are few landline options available for the elderly who prefer it. What are current customer options who need a public utility, and this is what they are provided?⁵²

CONCLUSION:

CenturyLink is not in compliance with Minn. R. 7810.5800's minimum objective of clearing 95% of troubles within 24 hours. This conclusion is drawn from CenturyLink's own data that demonstrates it rarely achieve the 95% in 24 hours standard, even when applying its own methodology that likely overstates the company's performance.

RECOMMENDATION:

Since CenturyLink's own data shows that it has violated Minn. R. 7810.5800, the Commission may establish a proceeding to determine the number of violations and the number of days of violations, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.⁵³ If the Commission determines that significant factual issues remain, the Commission may refer the matter to OAH to create a record upon which the Commission may make its determination.

⁵⁰ Attachment 5, Customer Number 0140

⁵¹ Attachment 5, Customer Number 0165

⁵² Attachment 15

⁵³ Minn. Stat. § 237.461 Enforcement

To address the ongoing concern, the Department recommends that the Commission order CenturyLink to submit a service restoration improvement plan, within 45 days of the Commission's Order, which describes in detail practicable steps to achieve compliance with Minn. R. 7810.5800. The plan should be explicit on when the 24-hour period begins, and when the service is recorded as restored. The plan should detail how CenturyLink personnel will be trained to use the new procedures. The service restoration improvement plan should be submitted for Commission approval and include a comment period to give interested parties the opportunity to support or recommend changes to the plan.

After Commission approval of the service restoration improvement plan, CenturyLink should be required to implement the plan within 60 days, unless CenturyLink asks for, and receives, Commission approval of a different implementation schedule. On a monthly basis after the service restoration improvement plan is implemented, CenturyLink should be required to file a report on its service restoration on an exchange by exchange basis. Such reporting should continue until the Commission finds that CenturyLink is satisfactorily complying with its performance obligations on service restoration.

D. CENTURYLINK IS NOT ADEQUATELY MAINTAINING ITS PHONE NETWORK.

The Commission notice asked whether CenturyLink complies with requirements regarding the maintenance of its telephone network. The Department concludes that CenturyLink's performance is inconsistent with Minn. R. 7810.3300 and Minn. 7810.4900. To comply, CenturyLink may need to upgrade its network and employ the necessary workforce resources to reduce the need for frequent repairs.

1. CenturyLink is not keeping all plant and equipment in a good state of repair as required by Minn. R. 7810.3300

Minn. R. 7810.3300 requires CenturyLink to keep its plant and equipment in a good state of repair. The rule further obligates CenturyLink to "adopt and pursue a maintenance program aimed at achieving efficient operation of its system so as to permit the rendering of safe and adequate service.... Adjustable apparatus and equipment should be readjusted as necessary when found by *preventive* routines...." The Department's review of CenturyLink practices suggest that the company largely relies on an inadequate system of reactive repair work to maintain its network instead of engaging in proactive, preventive care.⁵⁴ Consistent with this finding, CenturyLink explained, "Maintenance expense is, for the most part, related to emergency restoration of the network from outages or other major impacts."⁵⁵

⁵⁴ The documents include a checklist for Customer Premise Equipment (CPE), which appeared to be used when troubleshooting repair calls, and a similar checklist specifically for Business Technicians to use when handling accounts contracted to the company's Centurion Maintenance program. CenturyLink also sent a document with instructions to Technicians for reporting "irregular plant conditions," and similar documents with guidelines on wood pole inspections and buried service wires.

⁵⁵ See CenturyLink Response to OAG IR #008, Attachment 16.

According to CenturyLink, technicians must obtain approval from a field supervisor before replacing parts during a repair. CWA, however, asserted that CenturyLink managers direct technicians to “avoid replacing subpar, damaged, or immersed cables as a cost-saving measure, despite clear indications that the cables need replacement.”⁵⁶ To support this claim, the CWA submitted an email written by “Technician D.”⁵⁷ In the email, Technician D recalled an experience in which several of their colleagues had requested new cable to restore service to several CenturyLink customers. Technician D stated that, after they requested the new cable, “[t]he company refused and said it would cost too much money and they had no 2700 pr cable available. . . . [I]nstead they had us spend over a week trying to re-engineer [the connection] and put the customers into another cable between two manholes.”⁵⁸ The affected customers lost service for 10 days. Technician D further explained that CenturyLink used to keep spare cable on hand for similar repairs but now refuses to do so.⁵⁹

CWA’s complaint included several photographs showing damaged pedestals and other outside plant in various stages of disrepair.⁶⁰ CenturyLink dismissed the photographs and simply stated that “Its network is healthy,” noting that the company’s trouble report rate was less than 1 per 100 lines.⁶¹ Union leaders and technicians stated, however, that they had returned in October 2020 to the locations of damaged plant that were photographed in April 2020, that were included in the CWA filings to the Commission.⁶² Only one had been repaired. CenturyLink’s argument that its trouble report rate was less than 1 per 100 lines is relevant to Minn. R. 7810.5900 pertaining to trouble report rates, which is different than the maintenance of plant and equipment requirements in Minn. R. 7810.3300. The Department believes CenturyLink is in compliance with Minn. R. 7810.5900.

Between January and August 2020, CenturyLink reports that it generated more than **[TRADE SECRET DATA HAS BEEN EXCISED]** customer care records.⁶³ Instead of providing all of them, CenturyLink supplied a list of 23 randomly generated customer care records. However, **[TRADE SECRET DATA HAS BEEN EXCISED]**.

In October, CenturyLink provided an additional 500 randomly generated customer care records. All were chosen from calls to CenturyLink between January and August 2020, the “cause of trouble,” as described by CenturyLink were:

[TRADE SECRET DATA HAS BEEN EXCISED]

⁵⁶ See CWA Complaint Letter, p. 2.

⁵⁷ The CWA has withheld names and contact information of Members who have provided specific information related to this and similar instances. They cite a fear of reprisal by CenturyLink directed at Technicians who supply these types of examples.

⁵⁸ See email from Technician D, submitted with OAG IR #3, Allegation 4, pp. 5-6, Attachment 14.

⁵⁹ OAG IR #25 question a, Attachment 10.

⁶⁰ See Comments of CWA filed April 23, 2020, Doc. Id. 20204-162321-01 and attachments (3)

⁶¹ See Comments of CenturyLink filed September 18, 2020, Doc. Id. 20209-166678-01.

⁶² OAG IR #3, Allegation 4, p. 6. Attachment 14, and OAG IR #010, Attachment 22.

⁶³ See OAG IR #9, Attachment 17.

CenturyLink states that repairs are made when service is affected, but damaged infrastructure that can continue to perform is not replaced or repaired.⁶⁴ This approach to “maintenance” has resulted in a very high percentage of repair calls attributed to “worn or deteriorated plant.” CenturyLink’s failure to meet the 24-hour repair metric, and reports of missed repair appointments, indicate that CenturyLink has made the economic decision in its own self-interest to minimize its field staff, resulting in its network being neglected.

In response to the Department survey, several respondents submitted photographs of damaged pedestals. Several had reported the damaged infrastructure and CenturyLink had either sent technicians for makeshift repairs or the damaged infrastructure has continued to languish, sometimes for years:

The attached photos show the condition of the green box. I reported the problem that a vehicle had struck the box and the photo shows the condition it left the box with exposed wires. I initially reported the problem in April 2018. Their solution was to prop up the box and those wires are still exposed to the elements.⁶⁵

I have called on the attached pedestal for 15 years, and finally gave up. The pedestal has fallen over into the cable tv pedestal and broken it. The neighborhood has tried to set it upright numerous times and replace the pedestal cover, which no longer fits. When Century Link came out to repair a neighbor's service, I told the technician and showed him the pedestal. He left without fixing it.⁶⁶

Pictures of CenturyLink wires at 6229 and 6228 Birch Point Rd. Saginaw MN 55779. Finally replaced [pedestal] at 6228 after 2+ years. Wires still coming out of [pedestal] at 6229, wrapping around trees, going over the road, wrapping around trees and laying on top of ground at road.⁶⁷

Another survey respondent called and stated that there is a green pedestal in their neighborhood in Eyota, behind their property. The pedestal is poorly maintained with wires wrapped around the green box and has been this way for months. The customer has always been concerned about the condition of the pedestal.⁶⁸

During the investigation, Department staff also contacted the company to report a damaged CenturyLink pedestal to have a first-hand experience with calling CenturyLink concerning damaged equipment. Staff encountered extended wait times on hold and confusing choices related to the automated answering system. CenturyLink agents seemed mostly untrained in the broken pedestal

⁶⁴ OAG #008, Attachment 16.

⁶⁵ Attachment 18, photo 0175.

⁶⁶ Attachment 18, photo 0022.

⁶⁷ Attachment 18, photo 0027.

⁶⁸ Attachment 18, photo 1007.

reporting procedures, leading to multiple transfers between CenturyLink representatives. Attachment 19 from Rochelle Garrow describes her experience with calling CenturyLink and includes photos of the pedestal she reported to CenturyLink as damaged. The first picture was taken on March 4, 2021. The second and third pictures were taken over three months later, on June 22, 2021. The pictures suggest that a passerby roughly placed the pedestal cover back on the pedestal but did not want to touch the wires to tuck them within the cover.

CONCLUSION:

Evidence suggests CenturyLink is not in compliance with Minn. R. 7810.3300. Moreover, the firsthand experience of customers and regulatory staff shows that CenturyLink lacks adequate systems for maintaining its plant in good repair. In addition, it appears that the Company may not be making available the resources necessary to meet the Minn. R. 7810.3300 standard.

RECOMMENDATION:

- 1) The Commission may establish a proceeding to determine the number of violations and the number of days of violations of Minn. Rule 7810.3300, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.⁶⁹ If the Commission determines that significant factual issues remain, the Commission may refer the matter to OAH to create a record upon which the Commission may make its determination.
- 2) Within 90 days of the Commission's Order, CenturyLink should file a proactive maintenance plan to identify, monitor, evaluate, anticipate, and address: instances of temporary lines, above-ground lines awaiting burial, other exposed lines, broken or damaged pedestals, flooded facilities, broken or damaged poles, or other outside plant concerns, including those reported by customers or that reasonably can be anticipated. The proactive maintenance plan should include information regarding the training of CenturyLink employees and contractors regarding the process for identifying and reporting outside plant concerns. The plan should be subject to a review and comment period by interested parties.
- 3) CenturyLink should notify customers in writing of their ability to report plant concerns and include this information on its website and in any published telephone directory. The notice, website information and the manner it is displayed in the telephone directory should be submitted for review and comment.
- 4) CenturyLink should employ sufficient operations and engineering personnel to assure the furnishing of safe and adequate telephone service.

⁶⁹ Minn. Stat. § 237.461 Enforcement

- 5) CenturyLink personnel responsible for the proactive maintenance plan should meet monthly to review and evaluate Identified Plant Issues, and determine what actions are necessary to address the reported issues, including remediation, repair, or replacement of equipment, increases of parts and equipment inventory, and increases of permanent and contract staff levels. Issues that involve impacts to service or safety to the public will take priority.
- 6) CenturyLink should provide a quarterly report that: (1) affirms that the monthly meetings identified above have occurred; (2) lists the plant issues identified or addressed in that quarter; (3) lists when the issue was reported or determined, and how CenturyLink learned of the issue; (4) list the determination of remediation, repair, or replacement action to be taken; and (5) list when any action was taken. The quarterly reports should continue until CenturyLink obtains Commission approval to discontinue the reports.

2. CenturyLink may not be maintaining an "adequate operating force" to facilitate service as required by Minn. R. 7810.4900

Minn. R. 7810.4900 requires CenturyLink to perform traffic studies and to maintain the necessary records to determine that "sufficient equipment and an adequate operating force" are in use and can provide necessary service. The rule stipulates that equipment and operating force must be sufficient to facilitate service during the "busy hour, busy season." While rule does not allow the Commission to resolve labor disputes, it clearly directs the Commission to consider whether CenturyLink has sufficient staffing, or "operating forces," to meet customer needs.

Customer experiences suggest that CenturyLink lacks the adequate operating force to meet repair commitments. The Department survey did not ask specifically about missed appointments, but at least seven respondents mentioned specific incidents when they had to reschedule due to CenturyLink's inability to meet scheduled repair commitments. Others mentioned aggravation at missed appointments or the need to reschedule at the last minute. For example, customers stated:

On July 16 it continued to work intermittently in the morning, and I waited for the technician to come. The appointment was for 12:30-4:30. I checked online about 1:30 to see where he was and found the ticket had been cancelled. No one had come, no one had contacted me about it.⁷⁰

I took a day off from work, stayed home to meet with the technician and let him into our house. I was told they would call me the morning of with approximate timing. That didn't happen. After waiting almost 6 hours, I called CenturyLink to inquire when the tech would be to our house. After being on hold excessively, I was told the tech was just finishing up another call, and we would probably be next, but they would have the tech call me. After another hour, I called back because I hadn't heard anything. Again, a very long wait to speak to someone. This time, I was told the tech was on his way. About a half hour later, someone from CenturyLink called to

⁷⁰ Attachment 5, Customer Number 0050

say they didn't have anyone working in my area for that day and that we'd have to reschedule. I explained I'd taken a day off from work, (I work Mon-Friday), and that this was very inconvenient. The person seemed not to care at all and was very flippant. He insisted that we'd have to reschedule for another day and gave us no other options.⁷¹

We were even given several appointment times to get service--we were assigned 2-3 'repair' meeting times, '9am to 5pm' and an adult 'had to be present' --The first 2 times no one called or showed-up.⁷²

CONCLUSION:

CenturyLink does not appear to be in compliance with Minn. R. 7810.4900. The lengthy wait times and delays to speak with customer service representatives, to obtain repair appointments, and the frequency with which CenturyLink must re-schedule appointments suggest it lack adequate staffing to meet customer needs.

RECOMMENDATION:

The Commission may choose to establish a proceeding to determine the number of violations and the number of days of violations of Minn. Rule 7810.4900, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.⁷³ The Commission may refer the matter to the OAH to create a record upon which the Commission may make its determination.

To address the ongoing concern, CenturyLink may need to be subject to penalties for violations of the Commission's rules to provide the economic incentive for CenturyLink to update its network and employing adequate staffing. CenturyLink can be expected to take those actions that are in the economic interest of its shareholders and can be expected to disregard the Commission's rules if there is no consequence for doing so.

E. OTHER SERVICE QUALITY ISSUES

- 1. CenturyLink may not be continually reviewing its operations to assure adequate service, as required by Minn. R. 7810.5000*

Minn. R. 7810.5000 requires CenturyLink to provide telephone service to the public in its service area in accordance with its rules and tariffs on file with the Commission. The rule also requires CenturyLink to continually review its operations to assure the furnishing of adequate service. Finally, the rule dictates that CenturyLink must maintain records of its operations in sufficient detail as is necessary to permit such review and such records shall be made available for inspection by the commission upon request at any time within the period prescribed for retention of such records. Given the failures discussed above relating to recordkeeping and maintenance, the Department believes that CenturyLink has failed to meet its obligations under this rule.

⁷¹ Attachment 5, Customer Number 0087

⁷² Attachment 5, Customer Number 0122

⁷³ Minn. Stat. § 237.461.

CONCLUSION:

CenturyLink is not in compliance with Minn. R. 7810.5000. If the company had been continually reviewing its operations and adjusted accordingly, there would have been no basis for the CWA complaint, CenturyLink's records would not show deficient service, and there would be fewer customer complaints.

RECOMMENDATION:

Minn. R. 7810.5000 should be considered with any further investigation the Commission may take with respect to the violations of other rules.

IV. SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission Order the following:

- 1) **Complaint Definition.** Clarify for CenturyLink that a complaint is to be defined as any customer communication that expresses dissatisfaction with CenturyLink service, whether received directly from a customer or from a third party, placing focus on the substance of the customer communication. Also clarify that the company's response to the customer, and whether or not CenturyLink resolves the dissatisfaction expressed by the customer, are irrelevant to the definition of "complaint."
- 2) **Minn. R. 7810.1100 and 1200. Complaint Procedure and Record of Complaint.** CenturyLink shall file a plan to improve its complaint procedures within 45 days of the Commission's Order in this matter. The new procedure shall address a process for categorizing customer interactions as: 1. Inquiries; 2. Requests; or 3. Complaints. The complaint procedure improvement plan shall detail how CenturyLink personnel will be trained to use the new procedures. The complaint procedure improvement plan shall be submitted for Commission approval and include a comment period to give interested parties the opportunity to support or recommend changes to the plan. After Commission approval of the complaint procedure improvement plan, CenturyLink shall be required to implement the plan within 60 days, unless CenturyLink receives Commission approval of a different implementation schedule.

On a monthly basis after the complaint procedure improvement plan is implemented, CenturyLink shall be required to file a report on its customer interactions that are inquiries, requests, and complaints. The reports should include the name and address for the customer, the complaint codes and other specifics for the type of complaint submitted, the date the complaint was filed, the date the complaint was resolved or addressed, and whether the customer has expressed that they are satisfied with the outcome. Such reporting shall continue until the Commission finds that CenturyLink is satisfactorily complying with its performance obligations on customer complaints.

- 3) **Minn. R. 7810.5200 Answering time.** On a monthly basis, CenturyLink shall report answering time service levels to the Commission until it has reached a 90% answer rate within 20 seconds of the caller's last menu selection, consistently for three months. On a monthly basis, CenturyLink shall also report to the Commission, the number of calls dropped prior to connecting with an agent, and the shortest, longest, and average length of wait time before the calls were dropped. Reporting requirements will apply to Repair Call Center, and residential and commercial Business Offices, and will commence within 60 days of the Commission's Order, unless CenturyLink receives Commission approval of a different implementation schedule.
- 4) **Minn. R. 7810.5800 Interruptions of Service.** Within 45 days of the Commission's Order in this matter, CenturyLink shall submit a service restoration improvement plan, which describes in detail practicable steps to achieve compliance with Minn. R. 7810.5800. The plan shall explicitly state when the 24-hour period repair begins, and when the service is recorded as restored, and shall detail how CenturyLink will train personnel to use the new procedures. A comment period shall be allowed after CenturyLink submits its plan for Commission approval to give interested parties the opportunity to support or recommend changes. After Commission approval of the service restoration improvement plan, CenturyLink shall implement the plan within 60 days, unless CenturyLink receives Commission approval of a different implementation schedule. After the service restoration improvement plan is implemented, CenturyLink shall file a monthly report on its service restoration on an exchange by exchange basis. Such reporting shall continue until the Commission finds that CenturyLink is satisfactorily complying with its service restoration performance obligations.
- 5) **Minn. R. 7810.3300 Maintenance of Plant and Equipment.**

Within 90 days of the Commission's Order, CenturyLink shall file a proactive maintenance plan to identify, monitor, evaluate, anticipate, and address: instances of temporary lines, above-ground lines awaiting burial, other exposed lines, broken or damaged pedestals, flooded facilities, broken or damaged poles, or other outside plant concerns, including those reported by customers or that reasonably can be anticipated. The proactive maintenance plan shall include information regarding the training of CenturyLink employees and contractors regarding the process for identifying and reporting outside plant concerns. The plan will be subject to a review and comment period by interested parties.

CenturyLink shall notify customers in writing of their ability to report plant concerns and include this information on its website and in any published telephone directory. The notice, website information and the manner it is displayed in the telephone directory shall be submitted for review and comment.

CenturyLink shall employ sufficient operations and engineering personnel to assure the furnishing of safe and adequate telephone service.

CenturyLink personnel responsible for the proactive maintenance plan shall meet monthly to review and evaluate identified plant issues, and determine what actions are necessary to address the reported issues, including remediation, repair, or replacement of equipment, increases of parts and equipment inventory, and increases of permanent and contract staff levels. Issues that involve impacts to service or safety to the public will take priority.

CenturyLink shall provide a quarterly report that: (1) affirms that the monthly meetings identified above have occurred; (2) lists the plant issues identified or addressed in that quarter; (3) lists when the issue was reported or determined, and how CenturyLink learned of the issue; (4) list the determination of remediation, repair, or replacement action to be taken; and (5) list when any action was taken. The quarterly reports shall continue until CenturyLink obtains Commission approval to discontinue the reports.

The Commission should also give consideration to the following:

- 1) Minn. R. 7810.4900 Adequacy of Service and Minn. R 5000 Utility Obligations.** CenturyLink may need to be subject to penalties for violations of the Commission's rules to provide the economic incentive for CenturyLink to update its network and employ adequate staffing. CenturyLink can be expected to take those actions that are in the economic interest of its shareholders and can be expected to disregard the Commission's rules if there is no consequence for doing so. Minn. R. 7810.5000 should be considered with any further investigation the Commission may take with respect to the violations of other rules
- 2) Violations.** If the Commission determines that there is sufficient cause to find that CenturyLink has violated any rule, the Commission should establish a proceeding to determine the number of violations and the number of days of violations, for referral of the matter to the Office of the Attorney General to pursue civil penalties in district court.⁷⁴ If the Commission determines that significant factual issues remain, the Commission may refer the matter to the Office of Administrative Hearings to create a record upon which the Commission may make its determination.

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⁷⁴ Minn. Stat. § 237.461.

Table of Attachments

Attachment Number	Title
1	Questions in Email Survey
2	DOC IR 19
3	DOC IR 8 PUBLIC
*3	DOC IR 8 NOT PUBLIC
4	Statement of T. Perlick
5	Sample Customer Comments Received from Survey
6	Letter from CenturyLink May 18, 2021
7	Email complaint Ms.P
8	DOC IR 9 PUBLIC
*8	DOC IR 9 NOT PUBLIC
9	DOC IR 7
10	OAG 025 PUBLIC
*10	OAG 025 NOT PUBLIC
11	Att 3 to IR 3 PUBLIC
*11	Att 3 to IR 3 NOT PUBLIC
12	DOC IR 12
13	OAG 002
14	CWA Resp to OAG 3 PUBLIC
*14	CWA Resp to OAG 3 NOT PUBLIC
15	Ms. M Email
16	OAG 008 PUBLIC
*16	OAG 008 NOT PUBLIC
17	OAG 009 PUBLIC
*17	OAG 009 NOT PUBLIC
18	Photographs of Pedestals
19	Statement of Rochelle Garrow
20	OAG Request to CWA 010

*NONPUBLIC Attachments

1. If you called CenturyLink to report a service trouble or billing issue in the last two years...

- Was your issue resolved in a timely fashion?
- Were you placed on hold for an excessive amount of time before you could report your trouble to a customer service representative?
- Approximately how long you were on-hold?

2. If your telephone service does not work properly sometimes...

- Have you ever chosen to NOT complain or end a call to complain before speaking to someone because in the past you were placed on hold for too long?
- Are you treated respectfully when you speak with a customer service representative?

3. If you experienced a telephone service outage that lasted more than 24 hours in the last two years...

- Approximately how long did the outage last?
- Were you given a daily (pro-rata) credit for the length of the outage?
- Did CenturyLink schedule and complete your repair in a timely fashion?
- Did a technician come to your home or business and was the problem repaired on the first visit?
- Did you have an alternative means, such as a cell phone, to call 911 in the event of an emergency?

4. If you are a new customer with CenturyLink...

- Was your telephone service installed in a reasonable amount of time?
- If not, did you call to complain and what was the result?

5. If telephone equipment in your area is not properly maintained...

- Are cables on top of the ground rather than buried?
- If so, for how long have they been there?
- Are neighborhood pedestals (typically green boxes in front yards) in good condition?
- If not, the Department would appreciate it if you took a photo and sent it to us along with the street names at the nearest intersection?

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Docket Number: P-421/C-20-432 ☐ Nonpublic ☒ Public
Date of Request: 2/9/2021
Response Due: 2/19/2021

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Joy Gullikson; Lisa Gonzalez

Email Address(es): joy.gullikson@state.mn.us; lisa.gonzalez@state.mn.us;

Phone Number(s): 651-539-1877; 651-539-1880

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Request Number: 19

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

Background:

Minn. Rule 7810.1200 Record of Complaint states:

Each utility shall keep a record of all complaints received by it from its customers which shall be classified as directed by the Public Utilities Commission. The record shall show the name and address of the customer, the date and nature of the complaint, and its disposition and date thereof. The utility shall keep records of the customer complaints in such a manner as will enable it to review and analyze its procedures and actions.

Request:

1. How does CenturyLink define “complaint” for purposes of Minn. Rule 7810.1200?

To be completed by responder

Response Date:

Response by:

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Phone Number:

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85 7th Place East / Suite 280 / St. Paul, MN 55101
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Department of Commerce
Docket No. P421/C-20-432
Attachment 2

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Response:

CenturyLink and the Department filed comments on this definition in Docket No. P-421/CI-17-796. CenturyLink provided its position at that time:

CenturyLink suggests that the Commission review the definition of complaint in light of its stated purpose which is to allow the company to "to review and analyze its procedures and actions." This purpose suggests that the Company should have the flexibility to define the term and Commission review of company compliance should focus on whether it retains adequate records to analyze its procedures and actions. CenturyLink is confident that its records are adequate for that purpose. CenturyLink has records on each of the complaints at issue and has individual customer records in place to the extent additional information is needed.

This suggested approach not only squares with the language in the rule, but also makes sense for the Commission. If the Commission were to mandate a broad definition of the term "complaint" such as the one suggested by the Department, it would impose a very burdensome regulatory requirement without any demonstrated corresponding benefit. If the Commission were to make such a change — a rule-making proceeding would be a more appropriate place for such an action. However, history demonstrates the limited value and the extensive burden associated with a broad definition of the term "complaint." In 2008, the Department and Embarq entered into a stipulation setting forth a broad definition of the term to resolve a dispute related to

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Embarq's Alternative Form of Regulation Plan.' As a result of that settlement, Embarq agreed to implement an electronic complaint tracking tool that recorded all Minnesota complaints received in call centers and were escalated to a first level supervisor.³ Embarq created the tool and dealt with compliance over the course of its AFOR. As far as the company is aware, this additional tracking provided no help to the company in analyzing its processes and procedures.

The data did not appear to be used for any purpose by regulators. If the Commission were to adopt the proposed definition suggested by the Department or even the less restrictive definition agreed to by Embarq, it would impose a tremendous burden on Minnesota providers without any demonstrated benefit. The Commission should decline to specifically define the term and simply mandate that Companies maintain adequate records so that they can analyze their procedures and actions.

The Department argued for a broad interpretation of the term in comments filed on June 26, 2018. In response, the Commission directed CenturyLink to file complaints, inquiries and expressions of interest related to the Minnesota Telephone Assistance Plan. CenturyLink did so for six consecutive quarters. Neither the Commission nor the Department filed an objection to CenturyLink's classifications.

CenturyLink continues to adhere to its proposed definition of the term Complaint, but it also maintains customer care records that reflect every interaction with its customers.

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2. If a call is made directly to CenturyLink by a customer, where the customer has a problem with their service and is seeking relief, and not via a government agency, does CenturyLink consider this a complaint as it pertains to the requirements in Minn. Rules with respect to the treatment of complaints?

Response:

No. See response to subpart 1.

3. Does CenturyLink retain records of complaints it receives directly from customers, or does CenturyLink limit the retention of records to only those complaints that it receives via a government agency?

Response:

See response to subpart 1.

4. How long are records of complaints retained?

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Response:

Complaint data is stored for a minimum of seven years.

5. What is the process CenturyLink uses to analyze its procedures and actions from the complaints it receives?

Response:

The Customer Advocacy Group has detailed reporting of complaints and frequently analyzes this data for root cause identification and resolution. Additionally, the Customer Advocacy Group's leaders meet regularly with Mass Markets and Service Delivery Executives, among others, to review complaint trends and resolution progress.

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6. In addition to retaining audio recordings of telephone calls from customers speaking with Customer Care Agents and Repair Agents, what steps does CenturyLink take to comply with Minn. Rule 7810.1200? If CenturyLink does not retain such audio recordings, please indicate that is the case.

Response:

CenturyLink maintains call recordings for the required two years. Each complaint is also logged in Salesforce which the Customer Advocacy Group uses to manage the complaint resolution process, as well as analyze procedures and actions.

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Request Number: 8

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

Background:

Minn. R. 7810.5200 states:

Adequate forces shall be provided at local manual offices in order to assure that 95 percent of the calls will be answered within ten seconds. Ninety percent of repair service calls, calls to the business office, and other calls shall be answered within 20 seconds. *An "answer" shall mean that the operator or representative is ready to render assistance and/or ready to accept information necessary to process the call.* An acknowledgment that the customer is waiting on the line shall not constitute an answer. (emphasis added)

Request:

1. Please provide evidence that 95% of calls from customers in calendar year 2020 were answered in ten seconds. If the 95% standard was not met, provide the percent of calls that were answered within 10 seconds along with the documentation supporting that percentage.

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Response:

CenturyLink objects to this request. This standard applies to "local manual offices" which means calls that are connected manually in a local switch. CenturyLink does not use local manual offices.

2. Please provide evidence that 90% of repair calls, calls to the business office, and other calls, in calendar year 2020, were answered within 20 seconds. If the 90% standard was not met, provide the percent of calls that were answered within 20 seconds along with the documentation supporting that percentage.

Response:

The Commission and the Department of Commerce have long recognized the unreasonableness of the 20 second standard contained in this rule. In repeated Alternative Form of Regulation Service Quality Plans for Frontier, Citizens Telecommunications, Embarras and Qwest Corporation, the Department has agreed and the Commission has approved plans that set a 60 second standard which more closely aligns with modern practices. The most recent Qwest Corporation standard read:

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7. Service Center Access - Calls to the Service Center will be on hold no more than 60 seconds on the average after the last menu option is selected before being answered by a live service representative. The service representative will accept the information needed to begin processing the call and direct the caller to the appropriate specialized personnel, as appropriate. Compliance shall be determined by a 12-month annual statewide average of the performance for the measure for combined customer, business and repair calls.¹

[NOT PUBLIC DATA BEGINS]

¹ *Qwest Corporation Alternative Form of Regulation Plan*, Retail Service Quality Plan, p. 7, adopted in Commission Docket No. P-421/AR-09-790.

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NOT PUBLIC DATA ENDS]

3. Please explain CenturyLink's understanding of "ready to render assistance and/or obtain information."

Response:

CenturyLink's understanding of "ready to render assistance and/or obtain information" is when the telephone set of the live representative has been connected to the customer, or potential customer, and is ready to assist the calling party.

4. Please explain how CenturyLink monitors customers who are put on hold at some point during the call.

To be completed by responder

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Response:

Customer Care agents are focused on billing, payments and upgrades. Repair agents are skilled in technical troubleshooting. Where appropriate, we have provided separate responses for Care and Repair agents.

Repair:

Our leaders and supervisors utilize reports that show details at a channel, supervisor, agent and individual call level that have specifics regarding number of holds and hold times.

In addition, appropriate holds and hold times are part of a supervisor's call scanning process where individual coaching/feedback are provided to agents on specific contacts.

[NOT PUBLIC DATA BEGINS]

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NOT PUBLIC DATA ENDS]

5. Please provide customer service training and reference material that address wait times and procedures that address the process of placing customers on hold.

Response:

[NOT PUBLIC DATA BEGINS

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Statement

State of Minnesota

County of Hennepin

The undersigned, Teresa Perlick, hereby deposes and says:

1. I am over the age of 18 and am a resident of the State of Minnesota. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I am currently physically disabled following an accident in September 2018.
3. I have personal knowledge of the facts set forth below

I declare that, to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 27 day of June 2021.

1. On January 29, 2020, I called CenturyLink and spoke with Dana in the Retention department. I requested that my landline be cancelled and indicated that I wished to retain my Internet access.
2. On February 3, 2020 I received a notice via text that service was completed.
3. CenturyLink turned off my internet service, which I had requested to retain. CenturyLink did not disconnect my landline, which I had asked to be disconnected.
4. That same day, February 3, 2020, I called the retention department and spoke with Tracy and a supervisor named Monique. Monique said CenturyLink would fix the issue and credit a half month's bill of \$14.39. Monique further said I would receive a call when the work was done.
5. I received no call from CenturyLink.
6. My internet access was restored on or about February 4, 2020, but speeds appeared to be slower than they had been prior to the interruption in service caused by CenturyLink's mistake.
7. My February bill contained no credit and no changes were made.
8. On February 24, 2020, I called CenturyLink and spoke to Justin and he spoke to Monique. Monique said the problem was not fixed and CenturyLink could not determine how to turn off my phone service.
9. Monique further said that I would owe only \$28.79 per month for standalone internet access and Monique would "log in and credit my account for the balance of my bill" and this arrangement would continue monthly until CenturyLink was able to correct the problem, discontinue my landline, and bill me correctly for standalone internet access.
10. No changes were made to my bill. I was charged late fees because I had paid \$28.79 as advised by Monique, which was not the total erroneously billed by CenturyLink.
11. On the February 24, 2020 call, Justin told me he would credit me for a half month after I informed him that my internet service had not worked since it was turned off, then back on.
12. No credit was forthcoming.


13. By the end of June, 2020, I was being billed for both the telephone and the internet plus late charges. I was billed \$ 78.57 per month, and subsequently learned that all payments were being applied to the telephone bill.
14. On June 29, 2020, I received a disconnect notice. It stated that I owed: \$161.94 for basic service and \$152 for other services.
15. On June 28, 2020, I paid \$172.74 to avoid disconnection of my internet access.
16. On July 28, 2020, I called CenturyLink again and was on hold for 28 minutes with no answer.
17. On July 28, 2020, I paid \$141.20 to avoid disconnection of my internet access.
18. On August 24, 2020, I again telephoned the retention department. I was on hold 1 hour 16 minutes, until Saba answered.
19. Saba admitted that she could see I asked for disconnection in January. I informed her of Monique's statement that I would only owe \$28.79 per month and that I should have a credit balance of \$126.81. Saba credited my account by \$126.81
20. After 1 hour 45 minutes trying to resolve this, Saba told me Monique would call me on August 25. Then Saba transferred me to collections.
21. Collections said they could not help me and would transfer me back, but it would be an hour and a half before I could speak to anyone. Collections also told me that my balance was \$34.50, which included a \$3.50 "convenience fee" to make a payment, due to Saba's credit (instead of the credit balance). I was told I had to pay immediately to avoid disconnection.
22. On August 24, 2020, I paid \$34.50.
23. On December 21, 2020, I went to the 3 CenturyLink stores that were listed online. All 3 were closed.
24. On December 21, 2020, I called the sales department in hopes of getting a live person. The representative transferred me to the retention department. After being on hold 2 hours and 42 minutes I hung up.
25. On December 21, 2020, I also called the sales department and asked for a supervisor. After being on hold for 33 minutes, I hung up.
26. On December 22, 2020, I tried the chat feature. Agent said she could fix my problem, but then told me could only credit 2 months of service. As I was typing my reply, the chat was ended.
27. I was not able to resolve my issue with CenturyLink on my own as of the end of December, 2020, so I reached out to the Minnesota Department of Commerce on December 29, 2020.
28. On January 4th, 2021, I received a telephone call on my mobile phone from Dianna, a CenturyLink representative, who told me that she was assigned to investigate my case and that she would call me back in a few days. I did not receive a call back.
29. On February 24, 2021, I spoke with CenturyLink regarding gigabit internet access. The representative I spoke with suggested that I close my existing account and open a new account in order to sign up for gigabit service but I refused because I wanted to resolve the billing issues with the current account first.
30. As of March 1, 2021, my landline service was still not disconnected as I had requested more than one year earlier. CenturyLink still billed me for late fees, even though I consistently paid \$28.79 per month on time, which was the amount I had been told to pay by CenturyLink.
31. On March 24, 2021, I spoke with Dianna, who rudely insisted that I retain my landline to obtain a less expensive price for internet access. I explained again that one year earlier Monique had promised me that I would be charged for \$28.79 until CenturyLink had disconnected my phone,

which they had yet to do. I further explained to Dianna that I did not want to pay for something I did not want, such as a landline telephone.

32. Dianna then told me she was "done" and would shut off my phone, which would cause my internet service to "go way up" and I'd have to pay for that. Then she would have me sign up for gigabit service. I received an order confirmation that I would now be charged \$49 per month (up from \$28.70 per month) for my current inadequate internet access, instead of being immediately switched to gigabit internet access for \$65 per month.
33. Credits were applied to my February/March 2021 CenturyLink billing statement, bringing the account total to the correct amount, however, credits were labeled as "good will" credits, which was an incorrect description. The landline, which I had requested to be disconnected, was still operating.
34. My landline telephone service was finally disconnected on March 25, 2020.
35. On March 29, 2021, I called the CenturyLink Customer Loyalty Department and spoke with Eric, who told me that there were still outstanding charges on my account. He signed me up for gigabit internet access. Even though a door hanger left at my residence stated installation and modem were no charge, my account now showed charges for these items equaling approximately \$172.
36. On March 30, 2021, I called CenturyLink to correct the charges erroneously applied to my account on March 29, 2021. I spoke with Mark, who told me he made the corrections. Mark also told me that phone service was necessary to obtain the \$65 promotional price advertised on the door hanger. There was no mention of this requirement on the door hanger. Mark added a \$20 loyalty credit to reduce my bill.
37. After three visits, CenturyLink Technicians installed gigabit service to my home on June 2, 2021.
38. My billing problems were resolved in April 2021.

I declare that to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed the 27 day of June 2021.

Signed 

Teresa Perlick

Customer Comments from Survey

Customer 0112:

I have had very negative billing experiences that took 1 1/2 years to resolve. I was on the phone for hours either on hold or getting transferred from one person to the next and then I would be disconnected and have to start the process over. This happened several times. Another time when I started to tell the customer service agent my problem and they pulled up my account and saw all of the notes regarding my previous calls they hung up on me. Sometimes the charges would be removed for one billing cycle and then reappear the following months. Supervisors never called me back when the agent said the supervisor would have to deal with it and they weren't available. I believe Century Link does this to get people so frustrated that they'll quit complaining and just pay the Bill even though it was for the incorrect amount.

Customer 0135:

1. If you called CenturyLink to report a service trouble or billing issue in the last two years...

- Was your issue resolved in a timely fashion?

NO! I kept a journal. On Jan. 18, 2021, the power cord detached from my modem/WIFI box and would not stay put, so no internet! I drove to Best Buy to get a new adapter (\$20). Turns out that the connection port in the box is broken. Spent many minutes on hold to talk to a CenturyLink CSR. Then I accidentally disconnected myself and had to start all over and go thru the multitude of menu options before being placed on hold again for another 75+ minutes before their system disconnected me. Then tried their online chat option; I somehow got connected to some fee-for-service group from which I disconnected myself. As it was late in the afternoon, I again went thru the multitude of phone menu options, and sat on hold while I put together a pot of home-made chicken noodle soup. Two hours later, I finally got to talk to a live service person. He said they are horribly understaffed because of COVID, hence the long wait times. My new modem should arrive on Thursday; meanwhile, no internet service except via my phone.

As of the end of day, Friday, Jan. 22, still hadn't received the new internet modem from CenturyLink, so now on my 4th day without WiFi so no internet connection from my laptop and no ability to print. I really don't want to spend hours on hold again to complain when they rep said it would be delivered yesterday via UPS.

Still no modem delivery on Saturday. I'm not happy.

On Monday, Jan. 25, in the afternoon, called CenturyLink again because still no modem. I connected to a person right away. She could find NO documentation on my account from my call a week ago! She authorized a modem to be sent (to arrive Wed.) and I requested a 9-day credit on my account due to the previous rep not doing their job and me being w/o internet service for that many days.

By lunchtime Thurs. Jan 28, my modem still had not been delivered so called CenturyLink for the 3rd time. Was on hold for an hour, then the CSR who answered wasn't able to answer internet questions so I got transferred 2X before I got someone (offshore, I think) who could work with me. Got the same song-and-dance as Tuesday, that the last modem request didn't process/failed in their system. After venting my frustration about now the 3rd run-around with the same excuses, the problem needed to be fixed immediately or I would cancel my account. She will next-day-deliver the modem, first saying I had

to pay a delivery fee until I adamantly stated that I wasn't paying a fee for their errors! She relented. Then, I HAD TO ASK for a 10-day credit on my account because their inability to do as they say; she submitted the request to the billing department. Very frustrated.

After 3 p.m. on Fri., Jan. 29, I called Century Link again because still NO modem delivery. My call went directly to a supervisor in Omaha. I wonder if that was just luck or if my account has been flagged as an irate customer?!?! (Which I ended up being again today. She wasn't happy when I commented that I had been lied to 3 times by previous CSRs) She stated that yesterday's request was processed in their system after the 2 p.m. cut-off for next day deliver. Interesting, because the CSR told me she was processing the request as we spoke, and I disconnected about 1:22 p.m. And it isn't in the UPS system yet! Should be delivered tomorrow, like I'm counting on that one anymore. As a back-up, she scheduled me for a service call on Tuesday next week to deliver a new modem. She was all full of "helpful" ideas, like, had I tried taping the power plug in place? Yes, I had tried tape. The power port is broken, honey, there's not power connection to be made. [CSR director friend] said I should send a letter to the MN Attorney General's office, which I will do when all is said and done.

Jan. 30-31 -- No Century Link modem delivery on any day.

Feb. 2 -- Was up early at 7:30 a.m. to be ready in case the C'Link tech shows up right away with my new modum. When the technician showed up on my doorstep about 9:15 a.m., two flat Century Link boxes were laying at his feet on my doorstep, delivered some time this morning before the tech arrived. "What's all this?" he asked. I just rolled my eyes and explained the sorry saga. He said to use the modem in his box because it's brand new; the others may be refurbished equipment and sometimes aren't thoroughly tested before being sent out. The other 2 boxes will be marked 'Return to Sender'. The new modem will be returned when my new xFinity internet/cable service is installed. (P.S. I will be saving significant \$\$ by bundling my internet with my xFinity cable, and getting all new fancy, voice-activated remote, cable tv equipment.) Before noon today, I was fully reconnected to the internet via xFinity—modem, laptop, printer, phone.

On Feb. 8 after lunch, I called Century Link customer service to cancel my phone and internet service.

Here's the saga that I posted on FB:

"I am so DONE with Century Link. I called them after lunch to disconnect my land line/internet account. After verifying my name, address, account #, account code, etc., the CSR told me he needed to have my last billing amount to continue. Well, all my billing/payments are done paperless/electron-ically and I wasn't online. I asked to be transferred to a supervisor and was told "I can't transfer you because we are changing systems and I can't transfer calls; I can have a supervisor return your call within 48 hours." And I said, "You are a phone company; your business is to handle calls; I don't believe that you don't have a back-up in place to transfer calls when 'changing systems'; I want to cancel my account today, not in 48 hours; transfer me to a supervisor." The CSR and I went round and round repeating these same words to each other for 15+ minutes. (I have a strong will!)

Meanwhile, I was en route to my laptop, logging in to the internet (via my new xFinity account connection that was set up yesterday!), and logging in to my CL account to find my last online bill. Amazing where dollars and cents can get a person. And was then told... "the closest day to cancel your account is tomorrow because the cancellation must be processed 1 day in advance." I asked him to verify that my account reflects the 2 weeks of internet service credit that Kathy, a supervisor in Omaha, NB, promised me on 1/29/21. (It did.)

I'm unplugging my phones as soon as I've posted this message, so if you have a phone # for me that starts with area code 952, it's history! I was a CL customer for 32+ years; bye-bye to all the frustration I've had dealing with them and off-shore CSRs over the last 3 weeks. I'm feeling fresh! (P.S., the CSR I had today was offshore and his accent was so thick that several times I couldn't understand a word he was saying and had to ask him to repeat.)

BUT, MY ACCOUNT WAS NOT CLOSED THE NEXT DAY BY CENTURYLINK, and I continued to get monthly billing statements and then past due notices (because I had shut off all automatic payments on my CL internet account from my back account.

Finally, on May 13, 2021, I called Customer Service and got a nice rep who recognized the situation, turned off my account, and credited every penny back. That should be the end of CL in my life.

- Were you placed on hold for an excessive amount of time before you could report your trouble to a customer service representative? YES -- see saga outlined in the saga in preceding paragraph.

Customer 0099:

I would like to provide comments regarding Century Link public service in regards to unburied cables that I believe are used for phone service. I do not receive service from Century Link but their unburied cable is in the right of way on my property.

In 2017 a large cable serving a number of homes in my neighborhood was cut due to construction by electric utility work. I am not sure how that happens if it was properly marked before construction. Century Link workers repaired the cable but did not bury it. On multiple occasions, I have spent hours on the phone trying to get Century Link to bury the cable. During these contacts, Century Link representatives have assured me that the cable would be buried within a month or so. After nearly 4 years the cable still lays unburied on the ground on my property! I don't seem to have any recourse in getting Century Link to complete the repair process.

Customer 0019:

We have basically only Centurylink to choose from because of where we live.

It is terrible, poor quality but expensive.

If you call customer service you have to have hours to commit.

You wait forever and when you finally get someone I'm sorry but we can't understand them.

Terrible, terrible service.

Customer 0022:

I have had so much trouble with Century Link, that I have removed my home phone service. When I call, I am on hold for long periods of time. I have waited on hold for 30-40 minutes repeat[ed]ly, and as long as 60 minutes before I gave up. The service representatives were rude and ignored my questions. I have called on the attached pedestal for 15 years, and finally gave up. The pedestal has fallen over into the cable tv pedestal and broken it. The neighborhood has tried to set it upright numerous times and replace the pedestal cover, which no longer fits. When Century Link came out to repair a neighbor's service, I told the technician and showed him the pedestal. He left without fixing it. The pedestal is located at XXXXX Round Lake Road.

Customer 0066:

Over the last two years have had to call on increased billing. When calling it takes a very long time to get to a live agent, even when saying agent. They reduced our bill but only for three months.

Also, we recently lost service for over (8) hours back in late April or early May. Automated system from a cell phone noted a cable issue in area which would be quickly fixed (which it was not).

This is an unacceptable for calling for help 911, and also affected my wife's work. Not even a call 8 hours later to say was fixed (we had to keep picking up the phone). Should not a bill be adjusted when their service is down for hours?

Also have to keep a close eye on their customer service reps as they don't always have your best interest in mind (try to up sell you).

Customer 0084:

We have not been without service for prolonged times that I have been aware of. The last couple times I remember calling, I had to hang up because I was on hold too long. It has been quite a while since I called.

Regarding billing: When I asked what a surcharge for '30 minutes long distance 911/TAM surcharge' was, the customer service rep didn't know. Our bill is supposed to INCLUDE the 30 minutes long distance. Why would anyone try to charge for 911 and I can't figure what TAM is. When I asked who CARVER sales tax is (county or city) once again, they don't know. The bill for phone and internet is excessive (\$83.77) but I haven't bothered to check with other carriers - laziness on my part.

Customer 0145:

I'm responding to an email received from AARP Minnesota Advocacy. I would be happy to share my experience as a CenturyLink customer. Please note, I contacted your office on several occasions regarding a billing dispute/service complaints about CenturyLink. A previous call was in 2017 or 2018. I have also contacted your office for complaints in 2019-2021. My correspondence should be on file with your office. I currently have only internet service with CenturyLink. I canceled my landline phone number in 2020 with CenturyLink.

1) **Yes,I reported service trouble and billing issues.** I've been on hold for extended periods of time with CenturyLink Customer Service. On several occasions the wait time exceeded 30 minutes. My calls were transferred to multiple departments and multiple representatives. My calls were dropped or hung up on during transfers. I had to call back and have to explain again what my concern was about a billing issue or service issue. I was never able to resolve billing and service issues with CenturyLink. I had to contact the Minnesota Department of Commerce to intervene to resolve these issues.

2) **Yes, my telephone service did not work properly.** One occasion occurred in July 2019. I moved to a new address and had notified CenturyLink two months prior to the move .I was promised the same service, price for life. My first bill at my new residence was much higher than what I was quoted. I called and was told that the "price for life" only applies if a customer never moves from one residence to another residence! When I moved in and set up my landline and computer, nothing worked. I had to

wait a week or so before a technician was dispatched to my new residence. When the CenturyLink technician arrived he said the order was not created properly in their system. The landline phone service was poor and audio quality was bad. I had to use my cell phone. Yet I continued to pay my monthly bill despite poor service. I called several times to report this. I was told by CenturyLink Customer Service that the technician said there was nothing wrong with my phone service. Plus I would be charged if I requested a technician visit.

I moved in 2020 to a new address. I decided to cancel my landline phone number/service with CenturyLink. Cancelling my landline number which was my original account number created billing chaos that could only be resolved by your office. I never agreed to any changes to my CenturyLink account number. I also had issues accessing my online customer account.

In October 2020, I started having issues with my internet service. Several times my internet service would be lost. I called CenturyLink and again, my call was routed to several different departments and multiple representatives who claimed they could help me. I tried calling the tech support line, only on one occasion did I find an employee who could address my service complaint. My internet speed is slower than what CenturyLink claims I am paying for with my current account. Speed tests differ vastly from the rate I am billed for internet service. From November-December 2020, same issue. Lost internet connection. A few times I had to wait more than 24 hours to get my internet service back. I never received any credit for lost internet service on any billing statements when the lost internet service occurred. Issue of lost internet connection kept occurring into January-February 2021. Again, I contacted your office for assistance. I called CenturyLink in February and they insisted it was my router or connection inside my apartment. Their office dispatched a technician. He only checked the router and said I needed a new router because the current router was outdated (2013). The router had worked without issues previously. Within one day, the same issue lost internet connection. I called CenturyLink and was told I would be charged if another technician was dispatched. So I had trouble shooting on my own. A few other occasions lost internet service. The company advertises 24/7 tech support. Yet I call the 800# and speak with someone who tells me they can't provide tech service. The first response is sending out a technician we will bill you. It's been my experience that CenturyLink's customer service and billing practices are substandard.

Customer 0087:

We have CenturyLink's service at our home, and have had for over 20 years. For the most part, it has a decent service, but expensive in my opinion. I hate having to call them, as it's have to get thru to a live person and if you do, expect to get transferred several times before getting anyone to help you.

We have had a few times where we've not had service, and I've had to call. The last time I called was extremely frustrating. I was on hold for 56 minutes trying to reach someone. I had to schedule a technician to come to our house. We have two phone lines and one was not working correctly and we were told it needed to be updated. We scheduled for the technician to come out, which I was told had to be done during the week. So I took a day off from work, stayed home to meet with the technician and let him into our house. I was told they would call me the morning of with approximate timing. That didn't happen. After waiting almost 6 hours, I called CenturyLink to inquire when the tech would be to our house. After being on hold excessively, I was told the tech was just finishing up another call, and we would probably be next, but they would have the tech call me. After another hour, I called back because I hadn't heard anything. Again, a very long wait to speak to someone. This time, I was told the tech was on his way. About a half hour later, someone from CenturyLink called to say they didn't have

anyone working in my area for that day and that we'd have to reschedule. I explained I'd taken a day off from work, (I work Mon-Friday), and that this was very inconvenient. The person seemed not to care at all and was very flippant. He insisted that we'd have to reschedule for another day and gave us no other options. We rescheduled it, and after getting a manager involved, I managed to get a Saturday appointment, after being told they don't do service work on Saturdays. Very poor customer service. Luckily the technician who ended up coming out on Saturday was knowledgeable and pleasant and was able to fix the problem. And no, there was no pro-rate credit or any compensation offered or given.

We've contemplated several times dropping CenturyLink, and just going with our cellphones for phone service. I just haven't taken the time yet to research who can provide us decent internet service in our area, as we would need that if we drop CenturyLink.

Customer 0050:

I received an email from AARP asking for feedback on CenturyLink telephone service experiences to be sent to this email address for the Minnesota Department of Commerce.

My husband and I are customers of CenturyLink for telephone and internet services and have been for many years. We have generally been pleased with their service and have had few problems with our service. In our experience, they are much better to deal with than Comcast and their product is more reliable.

However, from July 4, 2019 to May 27, 2020 we had serious intermittent telephone/internet line problems and it took that long (nearly a year!) for the problem to finally be resolved.

On July 31, 2019 after attempting many times to get the problem solved through the customer service online system I sent the following email detailing our problems and frustrations to Stephanie Polk, CenturyLink's VP Customer Advocacy:

Hello,

We have been having intermittent phone and internet problems since July 4.

On July 4 our phone was dead all day and the internet was intermittent. I scheduled an appointment for July 10, the earliest available.

On July 5 our phone began working again and kept working, so on July 8 I cancelled the appointment, thinking it wouldn't be necessary, which turned out to be a very unfortunate idea.

On July 10 our phone was dead and the internet was intermittent. I scheduled another appointment for July 16, the first available. The phone stayed dead until late in the evening, July 15, when it began to work intermittently.

On July 16 it continued to work intermittently in the morning and I waited for the technician to come. The appointment was for 12:30-4:30. I checked online about 1:30 to see where he was and found the ticket had been cancelled. No one had come, no one had contacted me about it. I called customer service and was told our problem was solved as "part of an outage". Our phone was

working in the afternoon July 16, but I made another appointment for a week later, July 23, the first available, because I did not believe we were part of an outage and I wanted a technician to come.

Our phone continued to work. A technician came to our house on July 22 (not our scheduled appointment of July 23) in the afternoon and luckily we were home to answer the doorbell. He was very nice and thorough with his testing of the lines with his instruments. He could not find any problem because our phone was working at the time. He gave me his card with his direct number and his supervisor's number, to call with further problems, so maybe he could come out in time to check it when it was dead if it went dead again without going through the appointment system.

Our phone continued to work until July 29, when it was dead all day, and the internet was intermittent. I called him and left messages. The technician has not returned my call or come by. He might still, but I made an appointment for August 9, TWO WEEKS out, the first available.

Our phone worked yesterday, July 30.

Our phone is dead again today, July 31, and the internet is intermittent, and we are now waiting for two weeks for a technician who may or may not come and may or may not be able to diagnose the problem, based on whether the phone is working that day or not.

I find it unacceptable to be made to wait a week, or worse, TWO weeks, for service.

My husband works from home and relies on the internet. He's had to buy hotspot wi-fi service from his cell phone vendor to continue to do his job.

We've had a total of 9 days in the month of July without phone service. Thank goodness we have cell phones, because what would we do in an emergency without phone service?

I would like a refund for these 9 days we've been without phone service while we wait and wait again and again for a technician to come.

I would like a technician to come that same day I report the problem to fix it while it is happening, or at the very least, within three days.

If this is the kind of service we can expect, we will have to start looking for better alternatives, and I'd rather not do that, because for so many years I have been pleased with CenturyLink.

In past years we've not been made to wait so long for service.

Customer 0176

My mothers phone developed so much static that it totally stopped working. Placed a call to Century link on a Thursday around 6pm. Took me well over 30 minutes to follow the choices to get to talk to a real person. They had given a fix date on the following Tuesday and I found this unacceptable. My mother is 89 years old and depends on a Lifeline for safety., which requires a working phone line. I explained this to them but it did no good. Fix date remained at that following Tuesday. It was fixed on that day and was bad line to her house. Incidentally she did fall over the weekend and was on floor for 6 hours because

her Life line did not work. They would never think of crediting your bill for 4 days. If there was any other option I would not use Century link.

Customer 1003: *phoned the Department instead of email; the following are notes from the conversation with an Analyst*

“Customer 1003” wanted to relay her recent history with CenturyLink (she has been in same home since 1972. (currently 88 y.o. with macular degeneration and hearing loss).

New Year’s weekend, her security system was on the fritz, calling her at 4 am—she called CL, and was told she needed a new alarm system. She called the provider and was told she didn’t need a new system, but that customers with CL service were having trouble. Eventually, she turned off her system.

On March 15 of this year, Customer 1003 had considerable static, so called to CL. CL told her she needed new phones, so she ordered and had installed new phones. On March 30th, the problem returned on the new phones. Called for repair, was told it would be 2 days before someone could come out. On April 1, CL came out to backyard and said problem was internet—but she told him it wasn’t internet. Repair person would not get out a ladder. Customer 1003 told tech that often times static was caused by squirrels chewing the wires. Problem went away but came back. On April 6 the problem came back and she called and was told another 2 day wait. Customer called Erin at PUC/CAO, CL came out next day instead of 2 days later. Problem was fixed—took about 2 hours.

On Thursday May 20, buzzing on phone—called CL and talked to man in IA who said couldn’t get anyone out until Monday. On Monday, got an email saying tech would be there—but no tech—got another email next day, did not come out. Eventually buzzing solved itself, but she is upset about the delays and missed repairs. Did receive \$35 credit and another \$10 credit.

Customer 0140:

In early April 2021 I contacted Century Link on behalf of my 95 Year Old Mother, who lives in an independent living apartment complex, to report her phone service was out...all we were getting was a Century Link Code Message to calls to her phone.

If you called CenturyLink to report a service trouble or billing issue in the last two years...

- Was your issue resolved in a timely fashion? NO
- Were you placed on hold for an excessive amount of time before you could report your trouble to a customer service representative? YES

- Approximately how long you were on-hold? 15 Minutes

2. If your telephone service does not work properly sometimes...

- Have you ever chosen to NOT complain or end a call to complain before speaking to someone because in the past you were placed on hold for too long? YES
- Are you treated respectfully when you speak with a customer service representative? Was treated professionally...but CS Rep was not willing to address or respond to the impact issues of the lack of phone Service

3. If you experienced a telephone service outage that lasted more than 24 hours in the last two years...

- Approximately how long did the outage last? YES, 4 Days

- Were you given a daily (pro-rata) credit for the length of the outage? Did not ask & did not look at the billing...amount of money involved would be minimal
 - Did CenturyLink schedule and complete your repair in a timely fashion? No...initial repair was scheduled for 5 Days (3 business Days) after the call reporting the issue...ALSO CENTURY LINK DID NOT SHOW UP THE DAY OF THE APPOINTMENT...THEY CAME ONE DAY LATER!
 - Did a technician come to your home or business and was the problem repaired on the first visit? Technician never came inside the independent living facility or apartment...repair was completed outside.
 - Did you have an alternative means, such as a cell phone, to call 911 in the event of an emergency? No, my 95 Year Old Mother does not have a cell phone, does not have anyone checking on her daily (Independent Living Apartment, Not Assisted Living), uses Life Line notification system (Emergency Button on chain around neck) for emergency situations...IMPORTANT TO NOTE LIFE LINE WORKS THROUGH THE PHONE LINES...SO MY 95 YEAR OLD MOTHER WAS ISOLATED FOR 5 DAYS! ***THIS CONCERN OF LACK OF ABILITY TO COMMUNICATE IN CASE OF EMERGENCY WAS EXPRESSED TO CENTURY LINK AT TIME THE PHONE ISSUE WAS REPORTED...RESPONSE WAS PROFESSIONAL, BUT UNCARING...CENTURY LINK WAS UNWILLING TO DO ANYTHING EXTRA TO ADDRESS THIS HIGH CUSTOMER RISK SITUATION.
4. If you are a new customer with CenturyLink...Service was started in 2017
- Was your telephone service installed in a reasonable amount of time?
 - If not, did you call to complain and what was the result?
5. If telephone equipment in your area is not properly maintained...Apartment was built in 2017
- Are cables on top of the ground rather than buried?
 - If so, for how long have they been there?
 - Are neighborhood pedestals (typically green boxes in front yards) in good condition?
 - If not, the Department would appreciate it if you took a photo and sent it to us along with the street names at the nearest intersection?

Customer 0165:

Hi- I've had several problems with my home phone/internet service thru century link in the last few years. Twice during the past couple years my phone service (and along with it internet service) went out and stopped working. Both times it was extremely hard to speak to an actual representative at Century Link. Their automated phone service routes you thru countless options none of which gives the option to speak to an actual representative. It took several calls to finally get a live person. Many times then they would have to transfer me to another department. Both times after testing and it showing the problem is not with connection in the house, but outside (meaning a Century Link issue) I was told for the repair ticket the earliest repair time would be 12 - 14 days!! When I complained that was not acceptable as it was my main phone and internet and I also work from home, I was told if I had needed speedier repair I should have purchased business phone line. This happened on 2 occasions. Both times were NOT after any major storm or event.... so it was not widespread phone outages in my area. Both times I was told 12- 14 days as the EARLIEST repair time and that I should have purchased a business phone line instead if I wanted faster service. When I again said 14 days without phone and internet was not acceptable they asked if I just wanted to to cancel the repair ticket all together, threatening that the only other option was to just not repair my service.

In all repairs over the last couple years the problem has been on the outside of the house, one time it was incorrectly fixed, and in all cases they tried to upsell me and tell me I should install fiber optic phone

cable it I wanted better more reliable service. I had no phone problems at all the previous 10 years I have lived here.

They did credit my account for unused days.

Customer 0122:

Hello,

We are answering your request/inquiry that AARP has communicated with us from YOU using their format.

1.- Report a service trouble and billing issue

I called CenturyLink to report a service trouble and billing issue TWICE in the last two year. [We are customers of theirs for over 50 years]

1st - about 1 1/2 years ago we lost both our phone and internet for about 2-3 weeks plus 4-6 weeks to resolve the extra charges and 2nd 5/27/2021 -lost both phone and internet Again =earliest appointment was 6/2/2021

1st=It took about 12 calls-(1 1/2 years ago) to get them to "repair" our phone and internet.. We were even given several Appointment times to get service--we were assigned 2-3 "repair" meeting times="9am to 5pm" and an adult "had to be present" --The first 2 times No one called or showed-up. Finally contacted you [Department] for help and then CenturyLink responded. They stated that main service line was "too corroded to replace" so they offered to install fiber optic line -stating that they would price it at a comparable price (by their definition) for I am a "price-for-life" customer. With your help a temp fiber line was finally run (in about 2 weeks).

After more calls to You-- after several months they finally adjusted our bill to only a few dollars more per month (service is still intermittent)

2nd =5/27/2021 -lost both phone and internet -Called Again earliest appointment was 6/2/2021 (Even though I reminded them that I have medical equipment dependent on the internet) This time the "repair" person did show-up and found that = The "new" fiber cable broke possibly during installation per the tech.

He had to run another temp line. --I feel that 7 days without service for a fix that took less than 1 hr is NOT timely

2. Telephone service does not work properly sometimes.--Yes..

- We have chosen to NOT complain or end a call to complain before speaking to someone because in the past you were placed on hold for too long--Yes over 1 hr.
- BUT we were always treated respectfully when speaking with a customer service representative.

3. YES=We have experienced a telephone service outage that lasted more than 24 hours in the last two years

--SEE ABOVE--plus

- Approximately how long did the outage last -SEE ABOVE
- After all the experience on the 1st --Not sure if we were given any given a daily (pro-rata) credit for the length of the outage?
- We will see IF we are given a daily (pro-rata) credit for the length of the outage any this time=2nd

- Did CenturyLink schedule and complete your repair in a timely fashion?
----- I feel without your help on the 1st time we would still be fighting them. --
2nd= I feel that 7 days without service for a fix that took less than 1 hr is NOT timely
- The technician came to our home and was the problem repaired --SEE above 1st--on the first visit
- 2nd-The technician came to our home and the problem was repaired on the first visit
Luckily we had a cell phone /alternative mean to call 911 in the event of an emergency.

5. Obviously our telephone equipment in your area is not properly maintained.

- They poorly buried -the cables so it broke in less than 2 years— we are in an old established neighborhood that has a lot of vegetation and they did NOT protect the lines!!
- If so, for how long have they been there---SEE ABOVE for the 1st --we will see on the 2nd- - possibly 1 -2 months?

Customer 0129:

We have Century Link telephone service at our home in rural Winona County. We live on a Minnesota State Highway. When we moved here, I had no idea I had to check beforehand to see if broadband was available. We live roughly 12 miles from the City of Winona.

Century Link offers only voice service in our area. At least twice each year, typically in the spring and autumn, after a good rain, the service goes out. I have to use my cell phone to call Century Link service. I typically have to wait on hold for at least 15 minutes. Once they are able to identify that our phone is not working, they typically schedule a repair visit, and the service personnel typically show up on time.

What's really kind of scary is when our power goes out, and our phone goes out at the same time. Unfortunately, our cell service isn't particularly good here, either, as we live in a valley. When that happens, our cell antenna also doesn't work, so I have to drive up to the expressway, where I can get service on my cell phone to call the power company and Century Link. If we had to call 911 from home in this situation (which happens maybe once a year), we'd be out of luck.

In addition, we frequently have a problem with a very loud buzz. Again, this typically happens in the spring and autumn after a big rain. It is sometimes so loud that I cannot hear the people I'm trying to talk with. When I'm having this problem, and I'm trying to call service, the interference is so bad that I cannot use the automated voice menus that one has to use these days -- either by speaking my account number (etc.), or by punching the numbers in on the phone. I always find it odd when I call about this problem that the customer service rep always says they need to test the line -- it always "tests" okay. Everyone I talk to on the phone when this problem is occurring can hear the problem without performing a test. But, the customer service reps are courteous, and I realize it's not their fault, but rather the fault of a greedy corporation which cares more about profit than customer service.

Some of the repair men have told me the cable we're connected to is plain old copper, and when it gets wet, that's when a problem occurs. He said he's informed his management that the cable needs to be replaced, but he's been telling them that for decades, and he doubts they will make the investment, because there aren't enough customers in this area to make it profitable. At one point, I was able to get in touch with the service manager, who said he would get back to me, but never did. Unfortunately, I no longer have my records from that attempt to get better service. I happened maybe 5 years ago, and I've given up on getting acceptable service from Century Link.

I thought there was a deadline for primary provider of telecom (Century Link is currently the ONLY telecom provider available to us) to provide broadband. Every time I have asked about it, I've been told they have no plans to provide broadband in our area. There is currently NO provider of internet in our area.

Right now, we are limping along with a copper telephone line which works most of the time, okay cell service (as long as the antenna is powered,) and a hotspot for internet.

Both phone and internet are NECESSITIES in this era. My feeling is that both should be treated from a regulatory standpoint as PUBLIC UTILITIES. The "free market" approach to telecom simply DOES NOT WORK in rural areas. Century Link could care less whether our phone works or not, and they care even less about providing broadband in this area.

Please feel free to contact me should you need any additional information.

Customer 0158:

I am following up to my previously sent comments because since Saturday, June 26, 2021, I have been without my home phone service. I have a "dead phone line" (likely due to this humidity we're experiencing at present). Once I discovered I had no dial tone on my home telephones (two hard-wired, and one cordless) on Saturday afternoon, I called CenturyLink Repair Service to report the problem. They told me the earliest someone could look into the problem was Monday, June 28. An appointment for repair was made, and I was told that someone would be at my house on Monday, sometime between 8:15am and 7:45pm, and I would need to be home when they arrived. I was told that the repair technician would send me a text message when they were on their way to my house in order to give me a more accurate timeframe of their arrival - usually about a 30-45 minute leeway.

The text message CenturyLink sent me at 7am on Monday June 28 repeated what I'd already been told: that a repair technician would be at my house sometime between 8:15am-7:45pm.

At 8:45am someone knocked on my front door - a man from CenturyLink was there to check out the problem. When I pointed out that he had failed to send me a text to let me know of his upcoming arrival, he seemed to disregard the issue and also seemed prepared to leave my house. I assured him that I wanted my home phone service restored as soon as possible. He asked what the problem was and I described it to him, as I had already described the problem to the representative on the phone on Saturday when I called. About 45 minutes later, I met up with that service tech as he was re-entering my back yard and he informed me that he was unable to fix the problem. He said the problem was a bad cable - that "it was in *really* bad shape". He said that "the cable crew" would have to look into fixing the problem. He said the cable crew might be at my house today (Mon.) or maybe tomorrow (Tues.), and that I could go on about my day, that I did not need to be home for their arrival.

I then left home for a few hours, returning around 1:25pm. A few minutes later, another stranger arrived, knocking on my front door, announcing he was with CenturyLink and was there to look into a problem. He, too, asked what the problem was, and again, I described the problem. Later in the afternoon, about 5:15pm, he returned to knock on my front door. He said he has not yet been able to restore my phone service, and emphasized - twice - that he'd been "working like a dog on the problem all afternoon." He said he'd be back tomorrow (today, Tues.). He did not tell me that I had to be at home.

I went out for a walk this morning from 9:50-10:45am and have been home since then. No one from CenturyLink has come to my house as far as I know, nor has anyone from the company sent me a text message.

And my home telephone line is still "dead".



CenturyLink™

Jason D. Topp
Assistant General Counsel
(651) 312-5364

May 18, 2021

Ms. Lisa Gonzalez
c/o Jeanette Anani
MN Department of Commerce
85 Seventh Place East, Suite 500
St. Paul, MN 55101-2198

Re: Ms. P.

Dear Ms. Gonzalez:

Enclosed is a CD which contains the audio recordings of two of the conversations between CenturyLink representatives and Ms. P. on February 24, 2021. The calls between CenturyLink Consumer Affairs Group representatives and customers are not normally recorded. For this reason, the calls with the Consumer Affairs Group representative and Ms. P. are unavailable.

Very truly yours,

/s/ Jason D. Topp

Jason D. Topp

JDT/bardm

Enclosure

RECEIVED
MAY 20 2021
MAILROOM

Name: Ms. P[REDACTED]

Phone: [REDACTED]

Address: [REDACTED]

ACCOUNT # [REDACTED]

Jan 2020:I got rear ended and lost my ability to work.

1/29/2020: called , spoke with Dana in the Retention dept, requested cancel landline, keep internet access

scheduled to turn off home phone

2/3: rcvd notice via text that svc was completed. They shut off my internet and left the phone on.
OPPOSITE OF REQUEST

2/3: call retention dept spoke with Tracy & supervisor Monique. Said they would fix and credit half mo Bill (\$14.39) & would call when done.

No call. - never called back - also told her that they would continue to credit until it was fixed, but never did

Has only used landline once to call CenturyLink

Feb Bill: no changes were made no credit given, charged late fees

2/24: called spoke to Justin. He talked to Monique. She admitted still not fixed, that they couldn't figure out how to turn off my phone service and that I only owed \$28.79/mo for internet and Monique would log in and credit my account the rest until she fixed it.

Justin told [REDACTED] that he would change her bill to give her the credits that Monique had promised but never happened

Also told Justin that internet hasn't worked since they turned it off then back on. He said he'd credit half mo bill.

No credited provided from anyone.

6/28/2020: called but waited on hold w no answer. Still being billed for both ph and internet. + late charges

All my payments were being applied to the ph.

Still charged late fees.

Rcvd disconnect notice dated June 29: Basic: \$161.94 Other: \$152 Total: \$313.94 Paid \$172.74 on 6/28

7/28/2020: called again. On hold for 28 min w no answer.

Paid \$141.20 on 7/28 Total paid \$313.94 even though I didn't owe anything for the ph

I had to pay in full because the notice said any amount less than the ph bill would result in disconnection.

Any \$\$ paid would be applied to the ph bill. but what she wanted was the internet

8/24: called retention dept again. 1 hour 16 min on hold. Saba finally answered.

Admitted she could see when I called in Jan to remove ph and all calls afterwards and that NOTHING had been done. I told her Monique said I only owed \$28.79/mo so if she did the math my account should reflect a CREDIT BALANCE of \$126.81. Instead she gave me a credit of \$126.81.

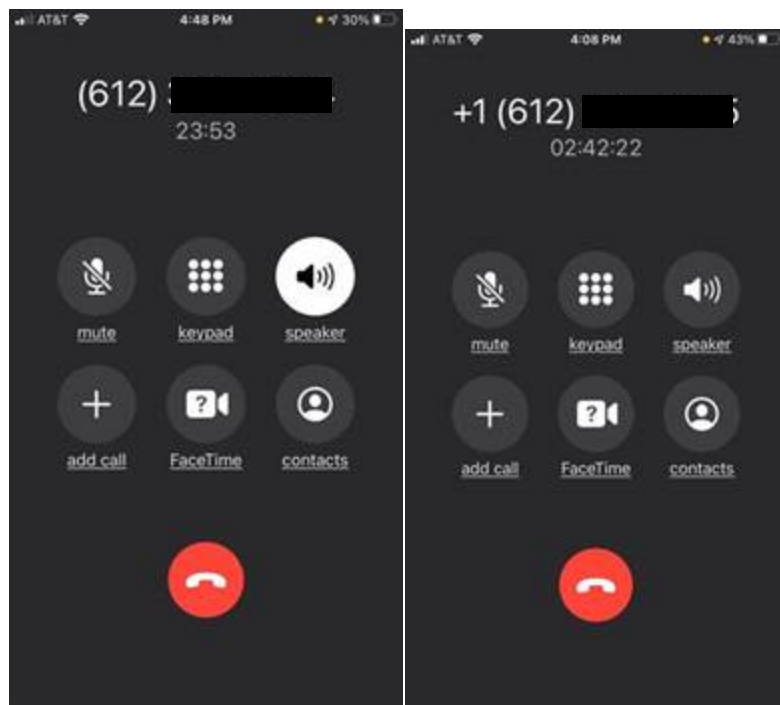
When I begged to talk to Monique or ANY supervisor she transferred me to collections. Even they said they had no idea why and couldn't help me and would transfer me back but wouldn't get me right through so I'd have to wait more than another hour on hold. And she told me my account now showed that I owed \$34.50 because of what Saba did. I had to pay immediately to avoid disconnect.

8/24: paid \$34.50

12/21: went to century link store listed online. Closed. Tried second and third locations. Closed.

Called sales dept to get a live person. They sent me to retention dept. After 2 hours 42 minutes on hold I hung up. Tried cust svc and asked for supervisor. They put me on hold and left me there for 33 min. I hung up.

12/22: tried chat. Agent said she could fix. Went through EVERYTHING. $12 \text{ (Jan-dec)} \times \$28.79/\text{mo} = \$345.48$. I've paid \$348.44 ($\$172.74 \text{ 6/28}$) + ($\141.20 7/28) + ($\$34.50 \text{ 8/24}$) + ($\$28.79 \text{ credit owed per Justin 2/28}$) + ($\$14.39 \text{ credit owed per Monique 2/3}$) Total owed: \$345.48 Total paid (+ credits owed): $\$391.62 = \46.14 CREDIT Chat agent then told me she could only credit 2 mos. when I was typing my reply she ended the chat. Last bill dated nov 21 states I owe \$316.18 so it's a matter of time before they threaten to disconnect again and I'll have to pay the entire amount just to keep my internet. I'm on disability and can't afford this. PLEASE HELP ACCOUNT # [REDACTED] Attached files are just 2 examples of proof of hold time with no answer. Calls were made to sales to talk to a human but then transferred to retention dept that won't answer.



Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Department of Commerce
Docket No. P421/C-20-432
Attachment 8
PUBLIC

Docket Number: P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 2/9/2021

Response Due: 2/19/2021

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Joy Gullikson; Lisa Gonzalez

Email Address(es): joy.gullikson@state.mn.us; lisa.gonzalez@state.mn.us;

Phone Number(s): 651-539-1877; 651-539-1880

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 9

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

Background:

Minn. R. 7810.5200 states:

Adequate forces shall be provided at local manual offices in order to assure that 95 percent of the calls will be answered within ten seconds. Ninety percent of repair service calls, calls to the business office, and other calls shall be answered within 20 seconds. *An "answer" shall mean that the operator or representative is ready to render assistance and/or ready to accept information necessary to process the call.* An acknowledgment that the customer is waiting on the line shall not constitute an answer. (emphasis added)

Request:

According to training or reference material for Customer Service Representatives:

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Department of Commerce
Docket No. P421/C-20-432
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ADDITIONAL INSTRUCTIONS:

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-
1. Is there a cumulative maximum length of time a customer may be left on hold?
 - a. If so, how what is that time?

Response:

[NOT PUBLIC DATA BEGINS

NOT PUBLIC DATA ENDS]

2. How does CenturyLink monitor the time a customer is on hold?

Response:

[NOT PUBLIC DATA BEGINS

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

PUBLIC DOCUMENT

NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Department of Commerce
Docket No. P421/C-20-432
Attachment 8
PUBLIC

Docket Number: P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 2/9/2021

Response Due: 2/19/2021

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

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NOT PUBLIC DATA ENDS]

4. When a customer is transferred to a different customer service representative, is that customer always placed at the end of the subsequent customer service representative's queue?
 - a. If the answer to 4. is yes, are there exceptions? What are they?
 - b. If the answer to 4. is no, what are the reasons for placing the customer at the end of the queue?

Response:

[NOT PUBLIC DATA BEGINS

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

PUBLIC DOCUMENT

NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Department of Commerce
Docket No. P421/C-20-432
Attachment 9

Docket Number: P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 01/06/2020

Response Due: 01/19/2020

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Joy Gullikson; Lisa Gonzalez

Email Address(es): joy.gullikson@state.mn.us; lisa.gonzalez@state.mn.us;

Phone Number(s): 651-539-1877; 651-539-1880

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 7

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

Background:

Minn. Rule 7810.5800 Interruptions of Service states:

Each telephone utility shall make all reasonable efforts to prevent interruptions of service. When interruptions occur, the utility shall reestablish service with the shortest possible delay. The minimum objective should be to clear 95 percent of all out-of-service troubles within 24 hours of the time such troubles are reported. In the event that service must be interrupted for purposes of working on the lines or equipment, the work shall be done at a time which will cause minimal inconvenience to customers. Each utility shall attempt to notify each affected customer in advance of the interruption. Emergency service shall be available, as required, for the duration of the interruption.

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Department of Commerce
Docket No. P421/C-20-432
Attachment 9

Docket Number: P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 01/06/2020

Response Due: 01/19/2020

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Joy Gullikson; Lisa Gonzalez

Email Address(es): joy.gullikson@state.mn.us; lisa.gonzalez@state.mn.us;

Phone Number(s): 651-539-1877; 651-539-1880

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request:

1. Provide CenturyLink's monthly performance results by exchange for calendar year 2020.
2. What methodology does CenturyLink use to calculate the Company's clearance rate for out-of-service repairs for voice service of Minnesota customers?

Response:

1. CenturyLink will provide this data but the data we received for our response to this request was incomplete and we will need to supplement this response with complete data.
2. CenturyLink uses the Date/Time the customer called in to report a trouble and the Date/Time the service was restored to determine the time to restore service. Then, the percent of Out-of-Service troubles restored within 24 hours is calculated by taking those tickets restored within 24 hours divided by the number of Out-of-Service tickets.

Supplemental Response 1/25/2021:

See Not Public Attachment 3, Tab 7.

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

NOT PUBLIC DOCUMENT –
CONTAINS TRADE SECRET DATA PUBLIC

Department of Commerce
Docket No. P421/C-20-432
Attachment 10

OAG No. 025

State of Minnesota
Office of the Attorney General
Utility Information Request

*In the Matter of Formal Complaint regarding
the services provided by the Qwest
Corporation d/b/a CenturyLink in Minnesota,
on behalf of the Communications Workers of
America (CWA)*

MPUC Docket No.

P-421/C-20-432

Requested from: CenturyLink

Requested By: Kristin Berkland
Telephone: (651) 757-1236

Date of Request:
Due Date:

May 26, 2021
June 8, 2021

Reference: OAG IR No. 016; CenturyLink's October 13, 2020 response.

[TRADE SECRET DATA BEGINS ...

... TRADE SECRET DATA ENDS]

Response:

See Not Public Attachment 25 for an updated performance chart.

Minn. R. 7810.5800 does not specify a methodology for calculating out of service in 24 hours. Instead, it requires "Each telephone utility shall make all reasonable efforts to prevent interruptions of service. When interruptions occur, the utility shall reestablish service with the shortest possible delay. The minimum objective should be to clear 95 percent of all out-of-

service troubles within 24 hours of the time such troubles are reported."

The methodology for calculating out of service in 24 hours in its Alternative Form of Regulation Plan is a straightforward application of this rule approved by the Commission and therefore provides an appropriate framework for calculating performance.

Response by _____
Title _____
Department _____
Telephone _____

***TRADE SECRET INFORMATION BEGINS HERE

TRADE SECRET INFORMATION ENDS***

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Docket Number: P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 2/9/2021

Response Due: 2/19/2021

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Joy Gullikson; Lisa Gonzalez

Email Address(es): joy.gullikson@state.mn.us; lisa.gonzalez@state.mn.us;

Phone Number(s): 651-539-1877; 651-539-1880

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 12

Topic: Click or tap here to enter text.

Reference(s): Click or tap here to enter text.

Background:

In response to OAG IR No. 002, CWA stated: "Customers, unaware of the PUC rules and regulations, are encouraged by the Company to accept the "earliest possible" appointment for repair at dates and times well beyond 24 hours from the call reporting the outage."

Request:

- a. If a customer calls CenturyLink to report an out of service concern, when does CenturyLink determine that the 24 hour period under Minn. R. 7810.5800 begins?

Response:

CenturyLink has not seen the response from the CWA and therefore cannot comment on the statement. Nonetheless, the start time is the Date/Time the ticket was created when the customer called in. The stop time is the Date/Time the service was restored/ticket closed.

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

Minnesota Department of Commerce
85 7th Place East / Suite 280 / St. Paul, MN 55101
Information Request

Department of Commerce
Docket No. P421/C-20-432
Attachment 12

Docket Number: P-421/C-20-432

☐ Nonpublic ☒ Public

Date of Request: 2/9/2021

Response Due: 2/19/2021

Requested From: Jason Topp
Qwest Corporation dba CenturyLink

Type of Inquiry: General

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Joy Gullikson; Lisa Gonzalez

Email Address(es): joy.gullikson@state.mn.us; lisa.gonzalez@state.mn.us;

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ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

- b. If the out of service call comes from a CenturyLink technician, when does the 24 hour period begin?

Response:

If a customer raises the issue directly to a technician, the technician refers customers to service support channels. Other network issues are reported to a supervisor who then opens a ticket. Regardless of how the ticket was opened, the start time is the Date/Time the ticket was created. The stop time is the Date/Time the service was restored/ticket closed.

To be completed by responder

Response Date:

Response by:

Email Address:

Phone Number:

OAG No. 002

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

*In the Matter of a Formal Complaint
regarding the services provided by the Qwest
Corporation, d/b/a CenturyLink in
Minnesota, on behalf of the Communications
Workers of America (CWA)*

MPUC Docket No. P-421/C-20-432

Requested from: CenturyLink

Requested By: Max Kieley
Telephone: (651) 757-1244

Date of Request: September 29, 2020
Due Date: October 13, 2020

CWA's initial complaint filed on April 23, 2020, states that "[w]hile the Company has hired a few contractors, they are not nearly enough to handle the existing workload." Please explain how many contractors are currently employed by CenturyLink in its Minnesota service territory. Please also describe CenturyLink's existing workload and how the Company plans to utilize its contractors to handle that workload.

Response:

CenturyLink does not have any contractors currently employed with responsibility for repair or installation of customer service.

Response by _____
Title _____
Department _____
Telephone _____

Attachment 14 may be considered Trade Secret in its Entirety

FN 68

Story of Ms. M. of St. Paul:

I ordered Internet service and an upgrade to long distance for my parents landline on August 9, 2020. I was told that it would be 2-5 days to receive the modem. We waited until August 18 when I contacted them to determine why they did not receive modem. They said there was a problem in their system and they would mail it for arrival on August 25. When ordered, I was clear that we did not need a technician to upgrade service line the did not need maximum speed, but for them to mail the modem and we would set up ourselves. On Friday, August 21, my father had to drive to my brother's house because a CenturyLink technician came out and did something to the line. After he left, their phone was dead. I do not know what he did, but assume he attempted to put in a high speed line which we did not request and do not want to pay for doing. However, the issue that is not just a minor annoyance of unrequested and poor service. My Mom is in hospice at home. Because they have not prioritized their repair, my Dad has no way to contact family, hospice or 911 if he needs help. My Dad had to leave my Mom alone in her hospital bed to drive to my brother's house and alert us. I have been trying since Friday to get a technician to repair the damage they did to the line. I have been told since Friday that an emergency alert was put in the request. However, three days later, and they are now saying that they cannot have a technician do repair until Tuesday, August 25. I have asked what their service request protocol is - and how it is possible that medical safety issues could not be the top priority. I was given multiple answers from no technicians working, they could get it done it was a priority, they cannot get it done until Tuesday, they could get it done on Monday, and they cannot change the priority list. I asked to speak to someone who has authority to make decisions on tech visit order. Once, I was told by someone that if I sent medical certificates they could get someone to their house today (8/23). But then the chat was shut down. Not sure how/why/if legal - sending medical documents to Centurylink? Now - we are still waiting to see if they do send a tech sometime this week. There are few landline options available for the elderly who prefer it. What are current customer options who need a public utility and this is what they are provided?

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

In the Matter of a Formal Complaint regarding the services provided by the Qwest Corporation, d/b/a CenturyLink in Minnesota, on behalf of the Communications Workers of America (CWA) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Max Kieley
Telephone: (651) 757-1244

Date of Request: September 29, 2020
Due Date: October 13, 2020

CWA's formal complaint filed on August 18, 2020, states that "CenturyLink Technicians have direct knowledge and have reported instructions from CenturyLink managers to avoid replacing subpar, damaged, or immersed cables as a cost-saving measure, despite clear indications that the cables need replacement." Please provide a narrative explaining all relevant facts and identifying all relevant documents regarding: (1) all CenturyLink policies or practices related to the maintenance, repair, and replacement of its outdoor plant; and (2) CenturyLink's annual budget allocated to the maintenance, repair, and replacement of its outdoor plant.

Objections:

CenturyLink objects to the request asking for "all relevant facts and all relevant documents." Such a request is vague, overbroad, a premature contention interrogatory and not reasonably calculated to lead to discoverable evidence. The Commission has not instituted a formal complaint proceeding and therefore CenturyLink cannot know all documents and facts relevant to claims that might be made there. CenturyLink will identify information it relied upon to provide its explanation.

REVISED 10/14/20

Response:

CenturyLink maintains its network through a maintenance budget, transformation budget, and capital budget.

Response by _____
Title _____
Department _____
Telephone _____

State Of Minnesota
Office Of The Attorney General
Utility Information Request

[Not Public Data Begins

Response by _____
Title _____
Department _____
Telephone _____

NOT PUBLIC DOCUMENT
NOT FOR PUBLIC DISCLOSURE

State Of Minnesota
Office Of The Attorney General
Utility Information Request

Not Public Data Ends]

Response by _____
Title _____
Department _____
Telephone _____

NOT PUBLIC DOCUMENT
NOT FOR PUBLIC DISCLOSURE

**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

In the Matter of a Formal Complaint regarding the services provided by the Qwest Corporation, d/b/a CenturyLink in Minnesota, on behalf of the Communications Workers of America (CWA) **MPUC Docket No.** P-421/C-20-432

Requested from: CenturyLink

Requested By: Max Kieley
Telephone: (651) 757-1244

Date of Request: September 29, 2020
Due Date: October 13, 2020

According to CenturyLink's September 18, 2020 comments, the Commission reviewed the Company's complaint tracking process related to TAP in Docket No. 17-196. However, in addition to being limited to TAP complaints, that docket appears to contain different and more abbreviated complaint information than the repair ticket information provided on page 9 CenturyLink's comments. Accordingly, for the period from January 1, 2020 to the date of these IRs, please provide a copy of all of the trouble reports and customer repair tickets received by the Company. Also, if the trouble reports and customer repair tickets are missing any of the information listed on page 9 of CenturyLink's comments, please located and provide the missing information. Finally, for the period from January 1, 2020 to the date of these IRs, please provide copies of all complaints filed by Minnesota "state agencies or other outside groups" and explain how they have been resolved by the Company's Customer Advocacy Group (see CenturyLink comments at pg. 9).

Objections:

CenturyLink objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. CenturyLink has requested the data responsive to this request and estimates it will take two additional weeks to compile.

Response:

Notwithstanding and without waiving these objections,

1. Responding fully to this request would require production of approximately [**Not Public Data Begins** **Not Public Data Ends**] customer care records. Not Public Attachment 9 is a randomly generated list of 25 customer care records from between January through the end of August, 2020.
2. CenturyLink is gathering information responsive to this request and will produce it at a later date.

Response by _____
Title _____
Department _____
Telephone _____

**PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED**

Photos of Damaged Pedestals Submitted by Survey Respondents

0175:

The attached photos show the condition of the green box. I reported the problem that a vehicle had struck the box and the photo shows the condition it left the box with exposed wires. I initially reported the problem in April 2018. Their solution was to prop up the box and those wires are still exposed to the elements [photo on right].

Lake Breeze Ave N., Brooklyn Center



0022:

"I have called on the attached pedestal for 15 years, and finally gave up. The pedestal has fallen over into the cable tv pedestal and broken it. The neighborhood has tried to set it upright numerous times and replace the pedestal cover, which no longer fits. When Century Link came out to repair a neighbor's service, I told the technician and showed him the pedestal. He left without fixing it."

Round Lake Rd, Eden Prairie



1007:

This survey respondent called and stated that there is a green pedestal in their neighborhood. It is between 4th and 5th Street on Madison Ave SW in Eyota behind their property. The pedestal is poorly maintained with wires wrapped around the green box. This pedestal has been this way for months. The customer has always been concerned about the condition of this pedestal.



0027:

"Pictures of CenturyLink wires at 6229 and 6228 Birch Point Rd. Saginaw MN 55779. Finally replaced [pedestal] at 6228 after 2+ years. Wires still coming out of [pedestal] at 6229, wrapping around trees, going over the road, wrapping around trees and laying on top of ground at road."



STATE OF MINNESOTA
COUNTY OF WASHINGTON

STATEMENT OF ROCHELLE R. GARROW

The undersigned, Rochelle R. Garrow, hereby deposes and says:

1. I am over the age of 18 and am a resident of the State of Minnesota. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.

I declare that, to the best of my knowledge and belief, the information herein is true, correct, and complete.

Executed this 29 day of June, 2021.

1. On March 16, 2021, I sought to contact CenturyLink Telecommunications to notify them of a damaged telephone pedestal just south of the intersection of Cahill Avenue East and Upper 62nd Street East in Inver Grove Heights, MN, 55076 (see photos below). I conducted an internet search for "How to report a damaged pedestal to CenturyLink", and choose the below search result:
<https://www.centurylink.com/home/help/home-phone/how-to-report-damage-to-a-telephone-pole-wire-or-cable.html>.

The link provided the following reporting instructions from CenturyLink:

How to report damage to a telephone pole, wire or cable

If you see a damaged telephone pole, wire, cable or pedestal, call us at **800-244-1111** to report the problem.

Tell us about the situation

When you speak with the repair agent, they will ask you for:

- Whether you are a CenturyLink customer or not
- Your name and telephone number
- Which services are affected – telephone and/or internet
- How the services are affected – noise on the line, no dial tone, no connection, etc.

It will be helpful if you can also provide:

- Address, directions and/or landmarks to locate damaged equipment
- Identifying numbers or marks on damaged equipment

- Description of equipment (i.e. Is the wire smaller or larger than a pencil?)
- Cause of damage, if known – termites, lightning strike, car crash, tree limb, construction, etc.
- Person/company responsible, if applicable
- Description of damage – leaning pole, drooping/cut wire, equipment missing door, etc.
- When damage likely occurred (such as days ago, weeks or months)
- Any other information – emergency personnel on scene, additional damage imminent.



2. On March 16, 2021, at 8:34 a.m., I called the telephone number provided by CenturyLink (800-244-1111), to report the damaged telephone pedestal just south of the intersection of Cahill Avenue East and Upper 62nd Street East in Inver Grove Heights, MN, 55076. Here is an approximate synopsis of that telephone call:
 - a) The CenturyLink phone menu options asked, "Are you an existing CenturyLink customer or have you recently placed an order?" I paused, and the menu then stated, "If you are an existing CenturyLink customer or recently placed an order, say or press 1; if no say or press 2." I said yes because CenturyLink is my telephone and internet service provider. The menu requested that I enter my phone number and the last four digits of my social security number.
 - b) I was then presented with menu options. However, there was not an option to report a damaged telephone pole, wire, cable, or pedestal. I went through several menu options and was eventually transferred to customer service. I explained to the customer service representative that I was not reporting an issue with my own service but was reporting a damaged pedestal I saw while out driving a couple weeks ago that still was not repaired. The customer service representative stated that she was transferring me to their POTS department. She also gave me the telephone number for the area that she was transferring me to (1-800-573-1311) in the event that I was disconnected. The customer service representative transferred my call at 8:42 a.m.
 - c) At 8:42 a.m. my call was answered by a new customer service representative. I informed her that I wanted to report a damaged pedestal I saw while out driving a couple weeks ago that still was not repaired. She asked me several times which service of mine I was calling about, and I explained that I was not calling about my own service, but that I wanted to report a damaged pedestal I saw while out driving. The customer service representative stated that she needed to transfer me. I asked for the telephone number/department that I was being transferred to and explained that I had called 1-800-244-1111 and that they transferred me to her. She said that she was transferring me to an internal CenturyLink number, and she could not give the phone number out. I tried to explain, again, that I had already spoken with someone at the general customer service number, and they transferred me to her. At 8:48 a.m. the customer service representative transferred my call.
 - d) At 8:48 a.m. my call was answered by a phone tree menu. I selected the repair option. Once in the repair menu there was not an option to report damage to a telephone pole, wire, cable, or pedestal. When asked by the electronic menu what I was calling about, I stated "pedestal repair", and "report a damaged pedestal", but those responses were not recognized by the menu. I finally choose the option for telephone repair. The menu then asked if I was calling about my home account or a business account. Neither option applied to my reason for calling. I stated "repair" and the menu stated that my call was being transferred (8:53 a.m.).

- e) At 8:53 a.m. my call was transferred. The customer service representative asked if I was calling about my service. I said no, that I was calling to report a damaged pedestal that I saw while out driving. She asked again if I was calling about my service. I again explained why I was calling. The customer service representative said she would create a repair ticket and took my name and telephone number. The customer service representative said she was having trouble hearing me and asked if she could call me back. I said yes, and the call disconnected at 8:57 a.m. The customer service representative called me right back and said the connection was better. The customer service representative asked for the address of the pedestal location. I told her it was south of Cahill Avenue East and Upper 62nd Street East in Inver Grove Heights. She said she needed a complete address. I told her that I didn't have one, and that the pedestal was on the boulevard south of the intersection of Cahill Avenue East and Upper 62nd Street East in Inver Grove Heights. I informed her that the zip code was 55076, and that I could send her pictures if it would be helpful. At 9:01 a.m. the customer service representative said she would put me on hold to create the ticket. She came back and asked me to spell the name of the city (which I did), and she put me on hold again. She came back and asked if there was a store or landmark in the area. I looked up the intersection on Google Maps satellite and saw a State Farm Insurance office near that intersection. I gave the customer service representative the address of the State Farm office. She put me on hold again so she could search their system. She came back and stated that the earliest they could get out there for the repair was Thursday, March 18 between 8:00 a.m. and 5:00 p.m. She said that the technician would call me about an hour before they arrived to ask questions. The call ended at 9:11 a.m.
3. Although the information on CenturyLink's website for reporting a damaged telephone pole, wire, cable or pedestal, instructs individuals to call 800-244-1111, when I did so I was not able to find a menu option for reporting a damaged telephone pole, wire, cable or pedestal. Instead, I was transferred several times and the call required 37 minutes of my time.

Signed



Rochelle R. Garrow

CWA Response to OAG No. 010: *“CWA’s initial complaint filed on April 23, 2020, states that “[t]he Company has also failed to maintain its physical plant (attached are a few photos of CenturyLink equipment that has remained unrepaired for months).” Please provide a narrative explaining all relevant facts and identifying all relevant documents supporting CWA’s statement that CenturyLink has failed to maintain its physical plant and has allowed network equipment to remain unrepaired for months.”*

The Company has failed to properly maintain its physical plant. **Attachments M, N and O** are photos of damaged pedestals and other equipment clearly visible to the public. **Attachment P** is made up of photos taken in October 2020 of the identical equipment, offering prime examples of equipment not being repaired or replaced for weeks or even months and in some cases almost a year. In fact, of the 21 issues documented by CWA originally, 20 have still gone unrepaired. It should also be understood, CWA has no idea how long the equipment had been in this state of disrepair prior to our discovery. Photos for areas not visible to the public are unavailable since it violates Company policy to take or provide photos in non-public areas. But Technicians insist that equipment in private areas is also in disrepair.

Administrative Rules 7810.3300 Maintenance of Plant and Equipment requires CenturyLink to keep “all plant and equipment in good state of repair consistent with safety and adequate service performance...Broken, damaged, or deteriorated parts which are no longer serviceable shall be repaired or replaced.” The photos contained in **Attachments M, N, O, and P** are perhaps just the tip of the iceberg when it comes to the disrepair of the physical plant.

The fact that so much of the damaged equipment photographed as much as a year ago have *still* not been repaired is testament to the fact that the Company cannot keep up with the maintenance of the physical plant now, let alone with a reduction of 32 percent of the Technician workforce.

Response by: Jeff S. Lacher
Title: CWA Staff Representative, District 7
Department: District 7
Telephone: 716-491-2839

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. P421/C-20-432

Dated this 1st day of July 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patricia	Beety	pbeety@lmc.org	League of Minnesota Cities	145 University Ave W Saint Paul, MN 55103	Electronic Service	No	OFF_SL_20-432_C-20-432
Gary	Carlson	gcarlson@lmc.org	League Of Minesota Cities	145 University Avenue West St. Paul, MN 55103	Electronic Service	No	OFF_SL_20-432_C-20-432
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_20-432_C-20-432
Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_20-432_C-20-432
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-432_C-20-432
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-432_C-20-432
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-432_C-20-432
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_20-432_C-20-432
Jeff S	Lacher	jlacher@cwa-union.org	Communications Workers of America	7600 Parklawn Ave Ste 412 Minneapolis, MN 55435	Electronic Service	No	OFF_SL_20-432_C-20-432
Susan L.	Naughton	snaughton@lmc.org	League Of Minnesota Cities	145 University Avenue West St. Paul, MN 551032044	Electronic Service	No	OFF_SL_20-432_C-20-432

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-432_C-20-432
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-432_C-20-432
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-432_C-20-432
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-432_C-20-432